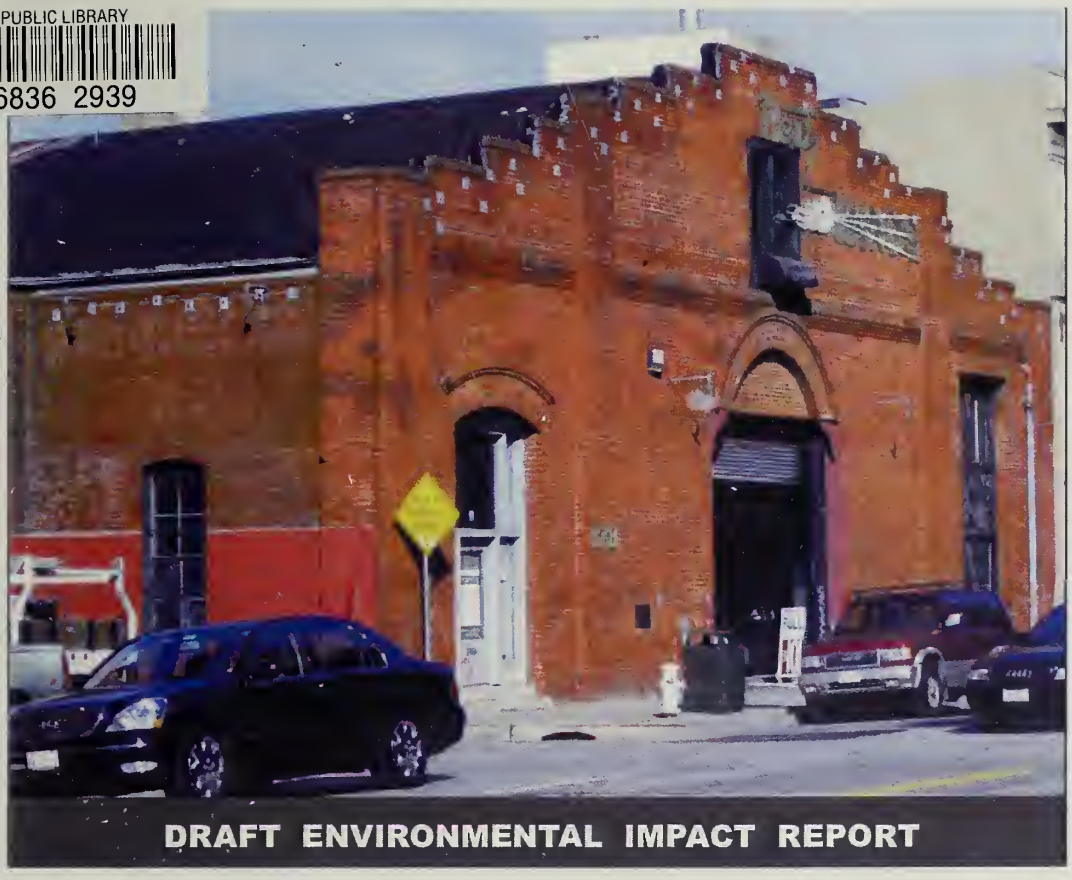

178 TOWNSEND STREET PROJECT

San Francisco Planning Department

Case No. 2005.0470E

State Clearinghouse No. 2007012109

Draft EIR Publication Date: December 22, 2007

Draft EIR Public Hearing Date: January 31, 2007

Draft EIR Public Comment Period: December 22, 2007 - February 5, 2008

●●●●

Written comments should be sent to:

Nycko, Acting Environmental Review Officer ● San Francisco Planning Department

1650 Mission Street, Suite 400, San Francisco, CA 94103

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DATE: December 15, 2007

TO: Distribution List for the 178 Townsend Street Project Draft Focused Environmental Impact Report

FROM: Bill Wycko, Acting Environmental Review Officer

SUBJECT: Request for the 178 Townsend Street Project Draft Focused Environmental Impact Report (Case No. 2005.0470E)

This is the Draft Environmental Impact Report (EIR) for the 178 Townsend Street Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, we will prepare and publish a document titled "Comments and Responses" that will contain a summary of all relevant comments on this Draft EIR and our responses to those comments. It may also specify changes to this Draft EIR. Those who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Draft EIR, together with the Comments and Responses document, will be considered by the City Planning Commission in an advertised public meeting(s) and certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final EIR. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one, rather than two, documents. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like a copy of the Final EIR, therefore, please fill out and mail the postcard provided inside the back cover to the San Francisco Planning Department, indicating whether you would prefer a hardcopy of the document or a copy on CD in Adobe Acrobat format, within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy. Public agencies on the distribution list will automatically receive a copy of the Final EIR.

Thank you for your interest in this project.

178 TOWNSEND STREET PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

San Francisco Planning Department

Case No. 2005.0470E

State Clearinghouse No. 2007012109

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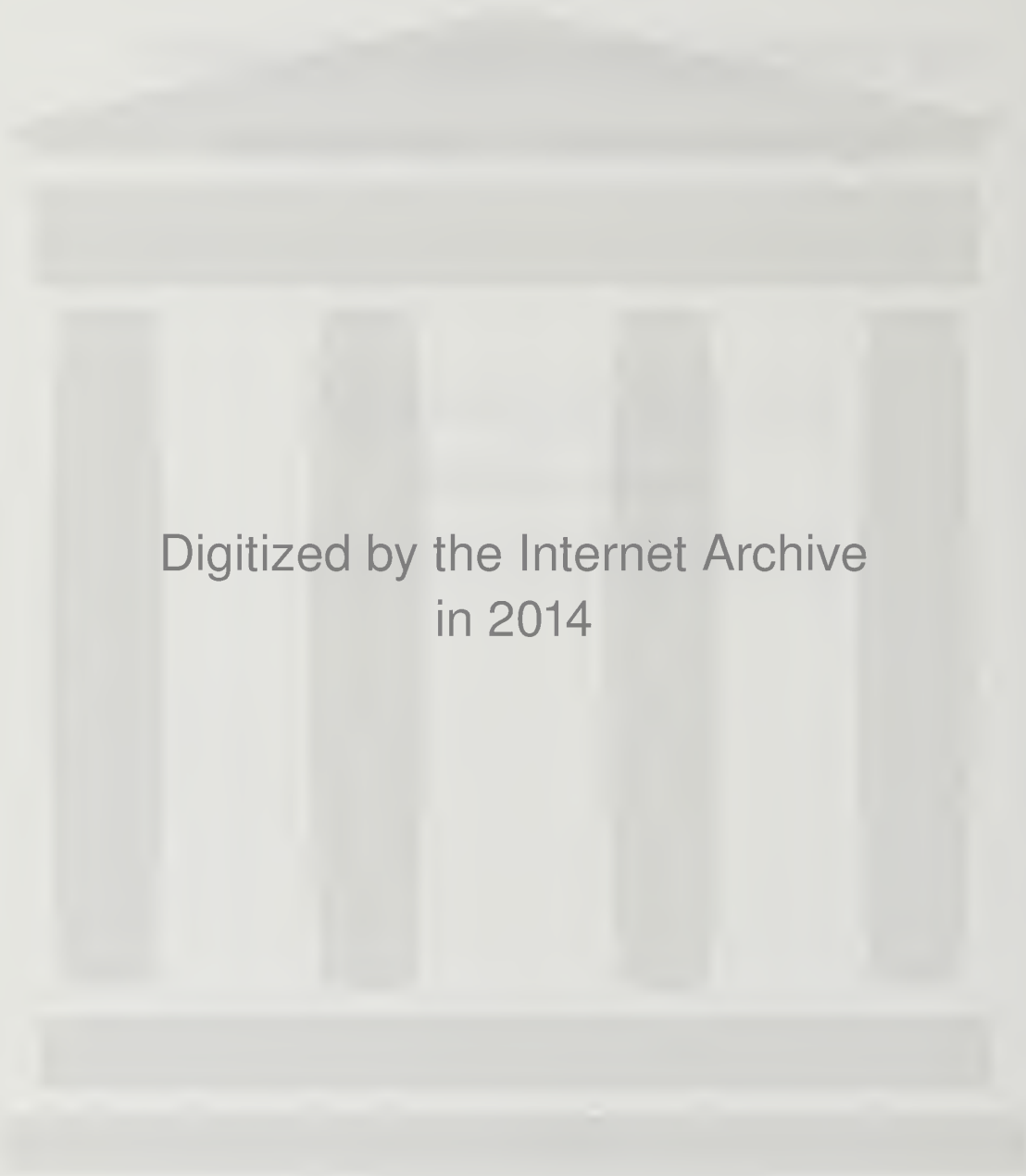
Written comments should be sent to:

Bill Wycko, Acting Environmental Review Officer ● San Francisco Planning Department

1650 Mission Street, Suite 400, San Francisco, CA 94103



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I. SUMMARY

A. PROJECT DESCRIPTION (P. II-1)

The project site at 178 Townsend Street is occupied by the California Electric Light Company Station B building, a contributory building within the South End Historic District. The Project Sponsor proposes to rehabilitate and convert the building from its current use as a valet parking garage to a residential use with up to 85 housing units and accessory off-street parking for the residential uses. The proposed project also includes ground-floor retail uses. The proposed uses would be housed in a five-story building that would be constructed within the footprint of the existing building on the site, totaling approximately 98,900 gross square feet (gsf), with up to 71,500 gsf in residential uses and up to 1,050 gsf in retail uses as well as parking space, open space, common area, and building service space.

New construction would include a partially below-grade parking garage, a five-story structure containing the residential and retail components, and street improvements along Clarence Place. The proposed new structure would be contained within the walls of the existing historic structure and would be set back 40 feet from the Townsend Street façade. The new building would rise above the historic structure's existing 23- to 42-foot tall roofline to a maximum height of 50 feet. The ground-floor level would include an enclosed entry courtyard accessible from the Townsend Street entrance, leading to a central hallway connecting to three smaller internal courtyards that would be open to the floors above. Approximately 5,373 gsf of common usable open space would be provided in the entry courtyard and on a roof-top deck. Balconies would provide an additional 3,754 gsf of private open space for 38 of the up to 85 proposed units. A one-level, 13,200-gsf, partially underground parking garage would include 74 parking spaces for use by the project's residents, with 72 spaces provided by two-car stackers, as well as 33 bicycle parking spaces in stacked lockers. The garage would be accessed through an existing opening in the façade on Clarence Place.

The project site is located in an SLI (Service/Light Industrial) District and 50-X Height & Bulk District within the current South of Market Base District and Area Plan. The intent of the SLI district is to retain light industrial uses by excluding general office and most residential uses. Although market-rate housing is not a permitted use on most sites in the SLI district, pursuant to Planning Code Section 803.5(c), any use which is permitted as a principal or conditional use (CU) within the Service/Secondary Office (SSO) District may be permitted as a CU in contributory buildings within any designated historic district within the South of Market Base District, a classification that includes the project site. Market-rate dwelling units may be

authorized with a CU in the SSO district, and therefore may be authorized with a CU at the project site as well.

The proposed project would require approval of a Certificate of Appropriateness under *Planning Code* Section 1006 for alteration of a contributory building in the South End Historic District and Conditional Use Approval by the Planning Commission (Commission); variance approval by the Zoning Administrator; issuance of building permits by the Department of Building Inspection (DBI); and issuance of street improvement permits by Department of Public Works (DPW) for pedestrian improvements to the Clarence Place right-of-way.

Existing land uses in the immediate vicinity of the project site include a mix of high-density residential, recreation, retail, and office uses, with limited light industry and warehouse uses. Three blocks north of the project site across Brannan Street is South Park, a neighborhood park surrounded by a mix of residential, retail, and small office uses. AT&T Park, the San Francisco Giants ballpark, is on King Street, one block south of the project site. The northeasterly portion of the Mission Bay area, a 303-acre portion of the city being developed with mixed-use residential, commercial, medical and bioscience research, office, and community facilities, is near the project site, beginning at Third Street and Townsend Street. The project site is served by several MUNI bus lines as well as two MUNI Metro light rail lines and the Caltrain heavy rail line at the King Street station.

To encourage new housing while preserving sufficient lands for the projected future growth of Production, Distribution and Repair (PDR) businesses and activities, the Planning Department (Department) has proposed changes in the *Planning Code* (zoning) controls, as well as amendments to the *General Plan*, for a 2,345-acre area on the eastern side of San Francisco officially referred to as the "Eastern Neighborhoods". The project site is included in the planning area of the East South of Market (SoMa) Area Plan, one of the four Area Plans being prepared as part of the Department's larger Eastern Neighborhoods planning and rezoning effort.[1]

B. ENVIRONMENTAL EFFECTS (P. III-1)

On the basis of the Initial Study published on January 27, 2007, the San Francisco Planning Department determined that the following effects of the project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures identified in the Initial

[1] The plan area is bounded generally by Folsom Street on the northwest, the Rincon Hill Plan area (Second Street) on the east, Townsend Street on the south, and Fourth Street on the west, with an extension to the northwest bounded by Harrison Street, Seventh Street, Mission Street, Sixth Street (both sides) Natoma Street, Fifth Street, and Folsom Street.

Study and thus required no further analysis: aesthetics, cultural resources (except historic resources), noise, air quality, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards/hazardous materials, mineral/energy resources, and agricultural resources. Therefore, the Environmental Impact Report (EIR) does not discuss these issues (see Appendix A: Initial Study). This EIR provides information on potential impacts of the proposed project on cumulative land use effects, historic resources, and transportation and circulation. These analyses conclude that the proposed project could result in a significant unavoidable contribution to cumulative land use effects due to the project's potential contribution to the cumulative loss of PDR space in the Eastern Neighborhoods.

CUMULATIVE LAND USE (P. III.A-1)

The project site is currently occupied by the historic California Electric Light Company Station B, a building that in the past has housed a number of warehouse and light industrial uses. Since 2000, however, the property has been used as an indoor commercial valet parking facility. The proposed project would replace the existing valet parking use with new residential and retail uses.

As discussed in the Project Description section above, the project site is located in the East SoMa Plan Area within the larger Eastern Neighborhoods rezoning study area. The Department published a Draft Environmental Impact Report (DEIR) on June 30, 2007, for the *Eastern Neighborhoods Rezoning and Area Plans* (the Eastern Neighborhoods DEIR). Among other topics, the Eastern Neighborhoods DEIR discusses the significance of the cumulative land use effects of the Eastern Neighborhoods rezoning by analyzing its effects on the City's ability to meet is future PDR space needs, as well as its ability to meet its housing needs as expressed in the City's *General Plan*. Because the project site is located within the Eastern Neighborhoods rezoning area in a zoning district (SLI) that currently permits a range of PDR uses, this project EIR analyzes the proposed project's potential to contribute to cumulatively significant land use effects in the Eastern Neighborhoods rezoning study area as identified in the Eastern Neighborhoods DEIR. CEQA defines a significant effect on the environment as a substantial, or potentially substantial, adverse change in a physical environmental condition (*CEQA Guidelines* Section 15382). The social and economic changes resulting from a project should not be treated as significant effects on the environment under CEQA unless they involve substantial physical impacts. However, the social and economic effects of a substantial physical change may be used to determine if the physical change is adverse (*CEQA Guidelines* Section 15064(e)). Thus, if the physical change caused by a project were substantial, and the social and economic effects caused by the substantial physical change were adverse, then the physical change could

potentially be considered a significant effect on the environment under CEQA. In the case of the proposed project, the potential cumulative physical land use effect under consideration is the project's contribution to the loss of space available for PDR use in the Eastern Neighborhoods, or the proposed project's potential to adversely affect the City's ability to meet its housing needs as expressed in the General Plan.

The Cumulative Land Use section of this EIR analyzes whether the proposed project would contribute to cumulatively substantial physical land use change in the greater Eastern Neighborhoods plan area. The neighborhood surrounding the project site has experienced substantial land use changes in the last decade, as the center of the area known as "Multimedia Gulch" during the late 1990s and, more recently, with the advent of substantial amounts of residential and commercial development fueled by the construction of AT&T Park, the extension of the MUNI metro light rail to the Caltrain station, and policies supporting land use changes in the nearby South Beach and Rincon Hill areas. Many formerly industrial sites have converted to other uses, and the immediate neighborhood does not offer substantial opportunities for continuation or resurgence of the area's formerly more industrial character. The proposed project would contribute to this overall change in the land use character of the neighborhoods by removing the subject property from the area's supply of potential PDR space.

The Cumulative Land Use Section in this EIR then analyzes whether the proposed project's contribution to cumulative substantial physical land use change in the greater Eastern Neighborhoods study area would be adverse based on whether it would significantly contribute to either of the following potentially adverse social and economic effects: (1) displacement of PDR businesses and jobs due to a future shortage of PDR space or (2) failure of the City to meet its housing needs as expressed in the *General Plan.*

While the project site has not been occupied by a PDR use since 2000, its current SLI zoning would permit a future PDR use. Thus, the project site is considered part of the City's potential PDR space affected by cumulative land use changes in the Eastern Neighborhoods. A consultant-prepared economic and land use study prepared in association with the analysis for the Eastern Neighborhoods rezoning effort known as the *"EPS Report"* conservatively projects the future 25-year demand for PDR land to be about 27 million sq.ft.[2] Although the allowable nonresidential floor area ratio (FAR) in the SLI zoning district is 2.5:1, with the presence of an

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[2] Economic & Planning Systems, Inc., Final Report, *Supply/Demand Study for Production, Distribution, and Repair (PDR) in San Francisco's Eastern Neighborhoods*" prepared for City and County of San Francisco, April 15, 2005, pp. 4, 5, and 7. This report is available online for public review at: http://www.sfgov.org/site/uploadedfiles/planning/Citywide/pdf/14158FinRpt1.pdf, accessed for this report on March 6, 2007.

existing, historic building on the site it is reasonable to assume that no additional space beyond the existing 1:1 FAR in the building would be created for PDR use. The 22,000-square-foot project site therefore represents 0.09 percent of this estimated future demand for PDR space.

Depending on the final zoning for the Eastern Neighborhoods adopted by the Board of Supervisors, as well as several other variables related to other industrial areas of the city, the proposed project could contribute to a potential cumulative future deficit in PDR space, and a corresponding decrease in future PDR jobs, which for purposes of this EIR would be considered an adverse social and economic effect. Thus, the project's contribution to cumulative physical land use change could be considered adverse and the proposed project would have a significant contribution to a cumulative land use impact. No mitigation has been identified for this significant cumulative impact.

With regard to housing, because the City's past housing production has consistently under-produced both market-rate and BMR units affordable to moderate, low-, and very low-income households, and because of external market forces, housing affordability is an issue of concern that is an existing condition in the city. The proposed project would contribute towards the City's ability to meet its housing production goals as set forth in the *General Plan* by contributing to the City's total annual production of new housing; producing up to 10 on-site below market rate (BMR) housing units; and providing new housing in close proximity to major transit corridors and hubs, a location designated as suitable for such development as discussed both in the Part II of the *Housing Element* and in the *Draft East SoMa Area Plan*.

For all of the above reasons, the proposed project would not adversely affect the City's ability to meet its housing needs as defined in the *General Plan*. The proposed project would contribute to the City's ability to meet its annual housing production targets. A combination of chronic shortfalls in capital subsidies and other city-wide problems independent of the proposed project or cumulative development in the Eastern Neighborhoods rezoning study area would likely prevent the City from meeting its annual BMR affordable housing production targets. As such, the proposed project would not contribute to a cumulatively significant land use effect related to the City's ability to meet its housing needs.

CULTURAL RESOURCES (P. III.B-1)

The proposed project could potentially cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco *Planning Code*. The project site is currently occupied by the California Electric Light Company Station B building, which was built in 1888 as an electricity generating plant and partially rebuilt after the 1906 earthquake for use as a hay

storage warehouse. The site is within the boundaries of the South End Historic District, designated in Article 10 of the San Francisco *Planning Code*, and has been identified as a contributory building within this District. In addition, while not currently listed on the National Register of Historic Properties (NRHP), the building has been assigned a California Historical Resource Information System status code of 3D, which indicates that the property "appears eligible for NRHP as a contributor to a NRHP eligible district."[3] Based on these ratings and the Department's *Historic Resources Evaluation Response* (HRER), the Department determined that the building qualifies as an historic resource under CEQA.

An independent historic resources evaluation (HRE) was conducted to provide detail about the building's history and architectural significance, to determine whether the building was likely to qualify as a historic resource under CEQA, and to predict what the expected impacts of the proposed project would be on the historic integrity of the resource. The HRE concluded that the building qualified as a historical resource in its role as a contributory building to the South End Historic District and that the proposed alterations would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, which are national standards used to assess a proposed project's impacts on historic cultural resources under CEQA.

The Department's HRER verified Station B's historical significance under CEQA and evaluated the proposed project in light of its potential to impair the existing building in its role as a contributor to the historic district. The HRER concluded that the proposed project would not result in a significant adverse effect on the historical resource. Specifically, the HRER determined that the proposed project would preserve the majority of the physical characteristics of the existing building that account for its listing as a contributor to the South End Historic District. The proposed addition would be set back approximately 40 feet from the Townsend Street façade so as not to overwhelm the massing of the historic structure, and would use contemporary materials and design to highlight the difference between old and new structures. Finally, the proposed project would not be expected to adversely impact any off-site historic resources. The project, therefore, does not result in a significant adverse effect on the environment with regard to historic cultural resources.

[3] California State Office of Historic Preservation (2004). *User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory*, California Department of Parks & Recreation.

TRANSPORTATION (P. III.C-1)

The proposed project is expected to generate approximately 1,077 person-trips (inbound and outbound) on a weekday daily basis, and 157 person-trips during the weekday PM peak hour.

TRAFFIC

Traffic Impacts

The proposed project would generate 32 inbound and 17 outbound vehicle-trips during the weekday PM peak hour. Project-generated vehicle trips were assigned to and from the project driveway on Clarence Place.

In general, the addition of project-generated traffic would result in relatively small changes in the average delay per vehicle at the study intersections, and most study intersections would continue to operate at the same service levels as under existing conditions.

Given that the project would not cause a decrease in intersection level of service at any of the study intersections, the proposed project would not result in a significant traffic impact.

Transit Impacts

The proposed project would generate 30 transit trips (19 inbound and 11 outbound) during the weekday PM peak hour. These transit trips to and from the project site would utilize the nearby Muni lines and regional transit lines, and may include transfers to other Muni bus and light rail lines, or other regional transit providers. In the immediate vicinity of the project site, the transit lines generally have available capacity during the weekday PM peak hour that could be used to accommodate the inbound and outbound transit trips generated by the proposed project, and the proposed project would not substantially affect transit operations.

Pedestrian Impacts

Pedestrian trips generated by the proposed project would include walk trips to and from the residential and retail uses, plus walk trips to and from the local and regional transit operators, and some walk trips to and from nearby parking facilities. Overall, the proposed project would add about 97 pedestrian trips (30 to/from transit and 67 walk/other) to the surrounding streets during the weekday PM peak hour. These pedestrians would enter and exit the proposed project via the entry to the internal courtyard and residential lobby on Townsend Street, and the entry to the residential lobby on Clarence Place. The project-generated pedestrian trips would be dispersed throughout the study area, depending upon the origin and destination of each trip. It is anticipated that a majority of the new pedestrian trips during the weekday PM peak hour

would be to and from the commercial uses on King and Townsend Streets west of the project site, and to and from the light rail stations on King Street and the Caltrain terminal at Fourth/Townsend.

These new pedestrian trips could be accommodated on the existing sidewalks and crosswalks adjacent to the project site and would not substantially affect the current pedestrian conditions along Townsend Street. As sidewalks in the project vicinity are generally between 10 and 15 feet wide, and currently have low to moderate levels of pedestrian activity, pedestrian conditions would remain acceptable.

The project sponsor proposes to provide an eight-foot wide sidewalk on Clarence Place adjacent to the project site. With the proposed sidewalk, pedestrian access to the existing residential and commercial to the north of the project site would be enhanced.

Bicycle Impacts

The proposed project would supply 33 bicycle parking spaces (in stacked lockers), to be located within the basement level of the parking garage. The *Planning Code* would require the proposed project to provide six bicycle parking spaces. The proposed project would provide 33 parking spaces, and it would meet the *Planning Code* requirement.

The project site is within convenient bicycling distance of downtown San Francisco, the Financial District and major transit hubs (Caltrain, Ferry Building, Transbay Terminal). As such, it is anticipated that a portion of the "other" trips generated by the proposed project would be bicycle trips.

There are several bicycle routes near the project site, including those along Second Street, Townsend Street, and The Embarcadero. With the current bicycle and traffic volumes on the adjacent streets, bicycle travel generally occurs without major impedances or safety problems. Although the proposed project would result in an increase in the number of vehicles in the vicinity of the project site, this increase would not be expected to affect bicycle travel in the area. Also, since the garage entrance to the proposed project would be off of Clarence Place, conflicts between project-generated vehicles accessing the site and bicyclists within the proposed bicycle lane would be minimized.

Since the proposed project includes bicycle parking in excess of that which is required by the *Planning Code* and project generated bicycle trips would easily be accommodated by existing bicycle facilities, no impacts to bicycles would occur and no mitigation is required.

Parking Impacts

The San Francisco *Planning Code* requires the proposed project to provide 85 independently-accessible parking spaces (one parking space per unit) and one car-share parking space. Since the proposed project would provide 74 parking spaces, it would not meet the *Planning Code* requirement for the number or type of parking spaces. The project sponsor would request a variance from the *Planning Code* requirements. The proposed project would provide one car-share space and would meet the *Planning Code* with regard to the car-share parking requirement.

The proposed residential uses would generate a demand for 107 parking spaces, and the proposed retail uses would generate a demand for about seven spaces. The peak residential parking demand would occur primarily overnight, although a portion of the residential demand would also occur during the day. Overall, the proposed project would generate a parking demand for about 114 spaces, of which 109 spaces would be long-term demand and five spaces would be short-term demand.

The proposed project would generate a long-term residential parking demand for about 107 spaces and a midday demand of 93 residential and retail spaces. The long-term residential demand generally occurs during the evening and overnight hours. The long-term parking demand of 107 spaces would not be accommodated within the parking supply of 74 parking spaces, which would result in a shortfall of 33 spaces. This shortfall would be accommodated on-street or in nearby off-street parking facilities that provide overnight parking. It is anticipated that a portion of the overnight parking shortfall would remain parked in off-street facilities during the day, resulting in a shortfall of 19 parking spaces (93-space total demand less the 74-space parking supply) during the midday period.

The proposed project would displace an existing public parking facility accommodating about 110 parking spaces. The vehicles currently parking on the project site would be displaced to other off-street facilities in the area, or to on-street parking spaces, and both on-street and off-street parking occupancy would be anticipated to increase. Additionally, the project's parking shortfall would also result in increased occupancy of on- and off-street parking in the area.

Parking shortfalls are a social effect rather than a significant physical impact, and are therefore not considered significant environmental impacts under CEQA. However, Improvement Measure 1, summarized on p. I-16, is designed to reduce the inconvenience associated with any parking shortfalls resulting from the proposed project.

Loading Impacts

The proposed project would generate approximately two delivery/service vehicle-trips per day. This corresponds to a demand for less than one loading space during both the average and the peak hour of loading activities. It is anticipated that most of the delivery/service vehicles that would be generated by the proposed project would consist of small trucks and vans. In addition, the residential uses would generate an occasional demand for large and small moving vans.

The proposed project would not provide an off-street loading area. The proposed project would request a 60-foot commercial vehicle loading/unloading zone on the west side of Clarence Place and a 60-foot passenger loading/unloading zone adjacent to the project site on Townsend Street. The *Planning Code* does not require the proposed project to provide any loading spaces for either the residential or retail uses.

The proposed project would generate a demand for about one loading space during both the average and the peak hour of loading activities. Given the limited number of uses served by Clarence Place, it is anticipated that the proposed project's loading demand could be accommodated within the proposed on-street loading zone.

Given that the loading demand generated by the proposed project would be accommodated by the proposed loading/unloading zone on Clarence Place, there would be no significant impact with respect to loading and no mitigation is required.

Construction Impacts

Information on the construction program for the proposed project was based on information obtained from the project sponsor. It is anticipated that construction of the proposed project would take approximately 16 to 18 months. Construction-related activities would typically occur Monday through Saturday, between 7:00 AM and 4:00 PM. It is not anticipated that construction activities would occur on Sundays, but may occur on an as-needed basis.

Construction staging would occur primarily within the site, and possibly adjacent to the project site on Clarence Place. A vehicular access lane would be maintained at all times. It is anticipated that the sidewalk along the proposed project frontage on Townsend Street would be closed during a portion of the construction duration, and that a temporary pedestrian walkway would be provided. During some construction phases the five on-street parking spaces on the west side of Clarence Street may need to be temporarily displaced to accommodate construction activities and ensure that vehicular access to uses to the north of Clarence Place is maintained.

Throughout the construction period, there would be a flow of construction-related trucks into and out of the site. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect traffic operations.

It is anticipated that there would be between 15 and 80 construction workers per day at the project site, depending on the construction phase. It is anticipated that the addition of the worker-related vehicle- or transit-trips would not substantially affect transportation conditions, as any impacts on local intersections or the transit network would be similar to, or less than, those associated with the proposed project.

Any construction traffic occurring between 7:00 a.m. and 9:00 a.m. or between 3:30 p.m. and 6:00 p.m. would coincide with peak hour traffic and could temporarily impede traffic and transit flow. Although this would not be considered a significant impact, Improvement Measure 2, summarized on p. I-17, would further reduce any potential construction-related transportation effects.

YEAR 2025 CUMULATIVE CONDITIONS

Overall, four of the seven study intersections would operate at LOS E or LOS F under the 2025 Cumulative conditions, as compared to one intersection under existing conditions. In general, the poor operating conditions would occur along the access routes to and from the I-280 King Street ramps (at Second/King, Third/King, and Third/Brannan). In addition, the intersection of Second/Bryant would operate at LOS F. Bryant Street provides access to the I-80 eastbound on-ramp at Sterling Place, and both Second and Bryant Streets serve as access routes to the I-80 eastbound on-ramps on Harrison Street at Essex Street and at First Street.

The proposed project's share of future traffic growth at the four intersections that would operate at LOS E or LOS F under 2025 Cumulative conditions would be minor: 0.1 percent at the intersection of Second/King, 0.3 percent at the intersection of Third/King, 0.2 percent at the intersection of Third/Brannan, and 2.8 percent at the intersection of Second/Bryant.

During the PM peak hour, the proposed project would add fewer than 10 vehicles to the four study intersections that would operate at LOS E or LOS F. The proposed project would generally add traffic to movements at each intersection that would continue to operate satisfactorily. In some instances, the proposed project would add vehicles to movements that would operate poorly under cumulative conditions, however, in these instances, the project's contributions to these movements would be minimal. The deterioration of traffic conditions occurring on freeway access routes is attributable to regional growth.

Therefore, the proposed project would not have a significant traffic impact.

C. MITIGATION AND IMPROVEMENT MEASURES (P. IV-1)

In the course of project planning and design, measures have been identified that would reduce or eliminate potentially significant environmental impacts of the proposed project. The EIR did not identify any mitigation measures because there were no significant impacts that could be reduced by mitigation measures. Mitigation measures identified in the Initial Study would be required by decision makers as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record. Improvement measures are suggested to reduce adverse environmental effects not otherwise identified as significant environmental impacts. Mitigation and improvement measures would be made applicable to the project as part of a specific project review.

Each mitigation measure from the Initial Study and improvement measure from the EIR is listed below.

MITIGATION MEASURE 1: ARCHAEOLOGICAL RESOURCES

Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The Project Sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall implement the ARD/TP. The consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archaeological Testing and Evaluation Plan. Analysis of subsurface conditions factors related to the structural integrity of the extant building determined that archaeological test trenches shall not be employed. Rather, archaeological monitoring, and data recovery if warranted, will

suffice to mitigate impacts to potentially significant archaeological features should they exist within the project area.

An Archaeological Research Design and Treatment Plan (ARD/TP) has been prepared by the Project Sponsor in consultation with the ERO, subject to review and approval of the ERO.[4] The conclusions/recommendations described in the ARD/TP are as follows:

1) A qualified archaeologist monitor any and all demolition-related excavation in archaeologically sensitive areas, and be authorized to collect samples of and document any cultural resources encountered during demolition-related excavation

2) Archaeological monitoring and concomitant data recovery (should resources of potential significance be identified) be implemented to the fullest extent possible during project construction in order to identify and mitigate adverse impacts to archaeological resources.

Archaeological Monitoring Program. Due to the extensive layers of concrete and rubble encountered within the project area during the geotechnical studies documented by Treadwell and Rollo (2002), an archaeological monitoring program shall be implemented, rather than the test trenching that would normally be conducted. The archaeological monitoring program shall minimally include the following provisions included in the Archaeological Monitoring Plan designed for the project site:

- The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential logical resources and to their depositional context;
- The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;

[4] Archeo-Tec, *Archaeological Research Design/Treatment Plan: 178 Townsend Street Project.* Prepared for EIP Associates, June 2006. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program. The archaeological data recovery program shall be conducted in accordance with the archaeological data recovery plan (ADRP) developed in the ARD/TP. The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation. The ADRP identifies how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP identifies what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The ARD/TP contains both a general Archaeological Data Recovery Plan and specific data recovery approaches for prehistoric and historic period cultural deposits; however, should a previously unanticipated cultural resource be identified during the course of archaeological research within the project site that is not treated in the ARD/TP, a brief, focused Archaeological Data Recovery Plan shall be prepared in consultation with the ERO to treat any such resource(s).

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate

notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, Project Sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archaeological Resources Report. The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California logical Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

MITIGATION MEASURE 2: CONSTRUCTION AIR QUALITY

The Project Sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the Project Sponsor shall require the contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose. The Project Sponsor shall require the project contractor(s) to maintain and operate construction

equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and to implement specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

IMPROVEMENT MEASURES

Improvement measures are suggested to further reduce less-than-significant environmental effects of a proposed project. They would not be required to reduce or avoid significant impacts. Improvement measures would be made applicable to the project as part of specific project review by the Planning Commission or other applicable decision makers as appropriate.

IMPROVEMENT MEASURE 1: TRANSPORTATION – PARKING

The proposed project would result in a midday shortfall of 19 to 40 spaces, eliminate 110 public parking spaces, increase midday off-street parking facility occupancy from 90 to 99 percent and create an overnight shortfall of 33 spaces, and displace four vehicle and three motorcycle on-street parking spaces. In order to reduce the proposed project's parking demand and shortfall and to encourage the use of alternative modes of transportation the following improvement measures are suggested.

- The project sponsor should include, as part of the move-in packet, a transportation insert. This insert would include information on transit service (Muni and BART lines, schedules and fares), information on where FastPasses may be purchased, information on nearby car share parking space locations, and information on the 511 Regional Rideshare Program.
- The project sponsor should "unbundle" the sale of parking spaces from the sale of residential units to provide a financial incentive for car-free living.

IMPROVEMENT MEASURE 2: TRANSPORTATION – CONSTRUCTION

Although construction impacts would be temporary and short term, the following improvement measures would lessen their impacts.

Any construction traffic occurring between 7:00 a.m. and 9:00 a.m. or between 3:30 p.m. and 6:00 p.m. would coincide with peak hour traffic and could temporarily impede traffic flow. Truck movements should be limited to between the hours of 9:00a.m. and 3:30 p.m. (or other hours as approved by the Department of Parking and Traffic), in order to minimize disruption of the general traffic flow on adjacent streets during the AM and PM peak period.

The project sponsor and construction contractor(s) should meet with the Agency, the Traffic Engineering Division of the MTA, the Fire Department, Muni, the Planning Department and

other City agencies to determine feasible measures to reduce traffic congestion. Prior to construction, the project contractor should coordinate with Muni's Street Operations and Special Events Office to coordinate construction activities and reduce any impacts to transit vehicles.

D. ALTERNATIVES (P. VI-1)

ALTERNATIVE A: NO PROJECT

Description

The No Project Alternative would entail no physical land use changes at the project site. The California Electric Light Company Station B building would not be converted, no restoration work would be completed, and no new residential, retail, or open space would be developed. This alternative would not preclude future proposals for redevelopment of the project site.

Impacts

If the No Project Alternative were implemented, none of the impacts or benefits associated with the proposed project would occur. The existing California Electric Light Company Station B building would not be converted, and the existing commercial parking uses would be retained on site.

The environmental characteristics of this alternative would generally be as described in the environmental setting sections of Section III. Land uses, urban design, visual quality, circulation, parking, and other physical characteristics of the site would not immediately change, except as a result of nearby development. Population, housing, and employment characteristics at the existing site could change under this alternative, as a result of market forces and implementation of the *Draft East SoMa Area Plan*. This alternative would be inconsistent with key goals of the *Draft East SoMa Area Plan*; this Plan focuses on the creation of a mix of land uses including neighborhood serving businesses and mixed residential areas within the eastern SoMa neighborhood.

ALTERNATIVE B: MIXED-USE PDR

Description

The Mixed-Use PDR Alternative is intended to respond to the loss of potential PDR space impacts of the proposed project. Under this alternative, the project site would be developed in a manner similar to the proposed project (described in Section II, Project Description), except

the ground floor would be primarily occupied by PDR uses (slightly less than the 22,000 square-foot footprint due to accessory uses). The following notable differences would also apply:

- The residential component would be reduced to about 66 units, compared to the proposed project which would have up to 85 units.
- A residential-compatible PDR component would be included on the ground floor. This area would be expected to have an approximately 17,000 square-foot footprint due to accessory uses such as entrances, stairways and mechanical areas.
- As with the proposed project, the California Electric Light Company Station B building would remain and the new development would be built within the existing structure.
- The basic architectural design and locations of support facilities (stairways, elevators, entrances) would mostly remain the same, with the exception of some of the openings along the Clarence Place façade that are included as proposed entrances to ground floor residential units in the proposed project.
- There would be no retail component included.
- The parking garage provided on site would remain the same as under the proposed project.

Impacts

The Mixed-Use PDR Alternative would be consistent with the goals of the *Draft East SoMa Area Plan*. This alternative would have characteristics similar to those of the proposed project, and its potential environmental effects—except as noted below—would be similar to those described for the proposed project in Section III, Environmental Setting and Impacts, and the Initial Study, Appendix A. Mitigation and improvement measures described in Section IV would also apply to this alternative. Differences between the proposed project and this alternative, with respect to effects on historic resources, cumulative land use, and transportation, are discussed below.

Cumulative Land Use

The Mixed-Use Alternative would result in the development of 17,000 square feet of PDR space within the footprint of the building, with the remaining space in the 22,000 square-foot building footprint occupied by access points and accessory uses on the ground floor. Because this alternative would realize opportunities for PDR uses on site, this alternative would not contribute to a significant cumulative land use effect. However, this alternative would involve a 23 percent reduction in the number of residential units that could be developed on the site, thereby decreasing the project's contribution to the City's housing supply.

Historic Resources

Similar to the proposed project, under the Mixed-Use PDR Alternative, a new five-story, mixed-use building would be constructed within the existing California Electric Light Company Station B building. The building under the Mixed-Use Alternative would result in similar modifications to the existing building, including removal of the roof, trusses, and modifications to the façade for access points and windows. There could be some slight differences in placement and number of openings that would be required at the ground level, but implementation of the alternative would still result in restoration of the façade and modifications to the existing structure. This alternative would have a similar effect on the property as a contributor to the South End Historic District, and would therefore result in less-than-significant impacts to historic resources.

Transportation

In general, light industrial uses generate fewer person trips per square foot than residential uses. Therefore, with the Mixed-Use PDR Alternative, the conversion of approximately 17,000 square feet of residential uses to PDR uses and reduction in the number of residential units on the site would result in a trip generation at the project site that would be approximately equal to or less than the trips proposed under the proposed project. As discussed in Section III, Environmental Setting and Impacts, the proposed project would not result in significant traffic or transit impacts. Therefore, the Mixed-Use PDR Alternative would also not be expected to result in significant traffic or transit impacts.

Under this alternative, the parking garage would remain the same as proposed, and would include 72 parking spaces with two ADA (Americans with Disabilities Act) accessible spaces. The Mixed-Use PDR Alternative would require one space per 1,500 square feet of manufacturing or industrial space as required under the *Planning Code*. At 22,000 square feet, the PDR component would require 15 parking spaces compared to the 19 parking spaces required for the ground-floor residential uses under the proposed project. Therefore, there would be a reduced parking requirement for this alternative under *Planning Code* requirements. However, as with the proposed project, the 74 spaces that would be provided in the parking garage would not meet the *Planning Code* standards for this alternative, and a variance would be required. Under this alternative, one off-street freight loading space would also be required by the *Planning Code*.

This alternative would not meet the project sponsor's objective of converting Station B to the desired mix of residential and retail uses.

ALTERNATIVE C: PDR-ONLY

Description

The PDR-Only Alternative would involve conversion of the existing 22,000 sq. ft. California Electric Light Company Station B building to a PDR use. The PDR-Only Alternative would not include any residential or retail uses. Under this alternative, the five-story building would not be constructed and there would be minimal structural changes to the existing building. Construction activities would be expected to consist of interior modifications and renovations to accommodate the new uses. The below-grade parking garage included in the proposed project would not be constructed due to the prohibitive costs and the reduced onsite parking requirement for this use under the *Planning Code*, and no parking would be provided on the site. It should also be noted that because of the economic costs associated with historic renovation, this alternative would not be expected to complete the proposed renovations to the historic structure.

Impacts

The PDR-Only Alternative would retain the existing structure at the site, with minimal structural changes. The environmental characteristics of this alternative would generally be as described in the environmental setting sections of Section III and the Initial Study. Visual quality, urban design, circulation, parking, and other physical characteristics of the site would not immediately change as a result of the alternative, but could continue to change in the area as a result of nearby development. Population and employment characteristics at the project site would change under this alternative, as a result of a land use change from a valet parking garage to a PDR use. This alternative would be inconsistent with some goals of the *Draft East SoMa Area Plan*; this Plan focuses on the creation of a mix of land uses, including neighborhood serving businesses and mixed residential areas, within the eastern SoMa neighborhood.

Cumulative Land Use

Because the project would allow for PDR uses throughout the entire existing 22,000 square feet of PDR space at the project site and would not restrict future PDR development and expansion at the site, the PDR-Only Alternative would not contribute to a cumulative reduction in opportunities for PDR use within the Eastern Neighborhoods. The PDR-Only Alternative therefore would not contribute to a significant cumulative land use effect. The alternative would add no housing on the project site and would not contribute to the City's efforts to meet its housing needs as expressed in the *General Plan*.

Historic Resources

Although a substantial seismic retrofit would be required to shore up and brace the existing building's unreinforced masonry walls, the PDR-only alternative would not result in any substantial exterior modifications to the existing historic structure; therefore, there would not be any significant impacts to historic resources.

Transportation

Like the Mixed-Use PDR Alternative, the PDR-Only Alternative would be expected to result in reduced trip generation at the project site compared to the proposed project. As discussed in Section III, Environmental Setting and Impacts, the proposed project would not result in significant traffic or transit impacts. Therefore, the Mixed-Use PDR Alternative would also not be expected to result in significant traffic or transit impacts.

The PDR-Only Alternative would require one parking space per 1,500 square feet of manufacturing or industrial space under the *Planning Code*. At 22,000 square feet, the PDR component would require about 15 parking spaces. Under this alternative, however, the proposed below ground parking garage would not be constructed, and therefore, there would not be any off-street parking provided at the project site. Under this alternative, one off-street freight loading space would also be required by the *Planning Code*.

This alternative would not meet the project sponsor's objective of converting Station B to the desired mix of residential and retail uses.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Both Section III, Environmental Setting and Impacts, and the Initial Study, Appendix A, determined that impacts in the following issue areas would be less than significant or less than significant with mitigation: aesthetics, cultural resources, transportation and circulation, noise, air quality, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards/hazardous materials, mineral/energy resources, and agricultural resources. Impacts in those issue areas would also be less than significant with implementation of the Mixed-Use PDR or PDR-Only Alternatives, because the alternatives would also be contained within the footprint of the existing structure and would result in the same or reduced population or employment activity at the project site. Additionally, the PDR-Only alternative would eliminate the less-than-significant impacts to historic and archaeological resources that would result from implementation of either the proposed project or the Mixed-Use PDR alternative. Both the Mixed-Use PDR and the PDR-only alternatives would eliminate the project's contribution to a

potentially significant cumulative land use effect identified in this EIR. Accordingly, because it would not result in a contribution to a potentially significant land use impact and would not result in any impact to historic or archaeological resources (including any less-than-significant impacts), the environmentally superior alternative would be the PDR-Only Alternative.

E. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This Draft EIR assess the proposed project's contribution to cumulatively significant land use changes in the Eastern Neighborhoods and the ability of the City to 1) meet its future PDR space needs and 2) achieve its housing goals as expressed in the *General Plan*. It also evaluates the potential impacts of the proposed project with respect to historic resources and traffic and circulation. The Initial Study prepared for the project (Appendix A) found that all other environmental effects would be less than significant, with mitigation measures identified for archaeological resources and construction air quality impacts.

On January 27, 2007, the Planning Department issued a "Notice of Preparation of an Environmental Impact Report." Individuals and agencies that received these notices included owners of properties within 300 feet of the project site, tenants of properties adjacent to the project site, and other potentially interested parties, including various regional and state agencies. Comments on the NOP/IS requested that access along Clarence Place to the property at the rear of the project site be maintained, and that impacts from construction be minimized.

With the publication of the Draft EIR, there will be another public comment period on the adequacy and accuracy of the environmental analysis that will last from December 22, 2007 to February 5, 2008, and will include a public hearing before the Planning Commission scheduled for January 31, 2008. Following the Planning Department's publication and distribution of the written responses to all comments received on the Draft EIR, the EIR will go before the Planning Commission for certification. After the EIR certification, the Planning Commission will consider approval of the proposed project.

II. PROJECT DESCRIPTION

The proposed project involves rehabilitation and conversion of the California Electric Light Company Station B building at 178 Townsend Street from its current use as a valet parking garage to a residential use with up to 85 housing units, accessory off-street parking for the residential uses, and up to 1,050 square feet of ground-floor retail use. The project sponsor is the Martin Building Company. The project location, characteristics, objectives, and approvals are described below.

A. PROJECT LOCATION

The project site is at 178 Townsend Street, on the corner of Townsend Street and Clarence Place between Second Street and Third Street, in the South Park area of the South of Market (SoMa) neighborhood (see Figure 1). The project site is on Assessor's Block 3788, Lot 012, which has an approximate area of 22,000 square feet (sf), or about 0.5 acres.

The project site is within an SLI (Service/Light Industrial) zoning district and is within a 50-X Height and Bulk District, which limits the height of buildings within the zone to 50 feet. The southern side of Townsend Street, directly across from the project site, is located within an M-2 (Heavy Industrial) zoning district and a 105-F Height and Bulk District, limiting the height of buildings within this zone to 105 feet. Approximately 150 feet to the east of the project site on the northern side of Townsend Street is an SSO (Service/Secondary Office) zoning district and a 50-X Height & Bulk District. Land uses in the immediate vicinity of the project site include a mix of residential, recreation, retail, and office uses, with limited light industry and warehouse uses.

B. PROJECT CHARACTERISTICS

The project site is occupied by the California Electric Light Company Station B building, a single-story reinforced brick structure that originally housed generating equipment and is currently used as a commercial valet parking garage with a capacity for approximately 110 cars. The main entrance to the site is on Townsend Street, with an additional access point on Clarence Place. The Project Sponsor proposes to rehabilitate the California Electric Light Company Station B building and construct a new building within the footprint of the existing building containing up to 85 housing units, accessory off-street parking for the residential uses and up to 1,050 sq. ft. of ground floor retail use. See Figure 2 for a site plan and Figures 3 and 4 for a

SOURCE: Google Earth, 2007.

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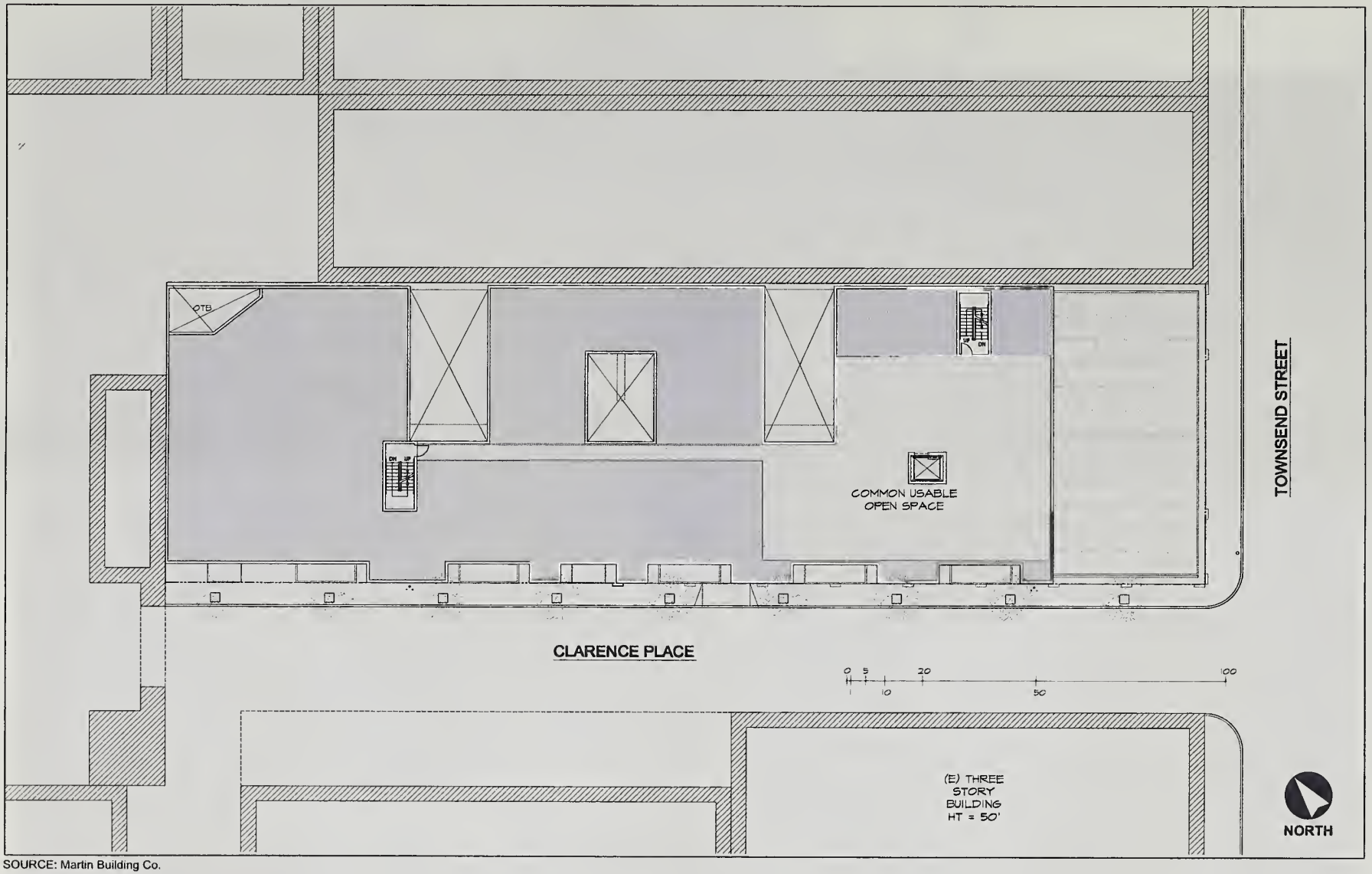
FIGURE 1: PROJECT LOCATION



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 2: SITE PLAN

SOURCE: Martin Building Co.

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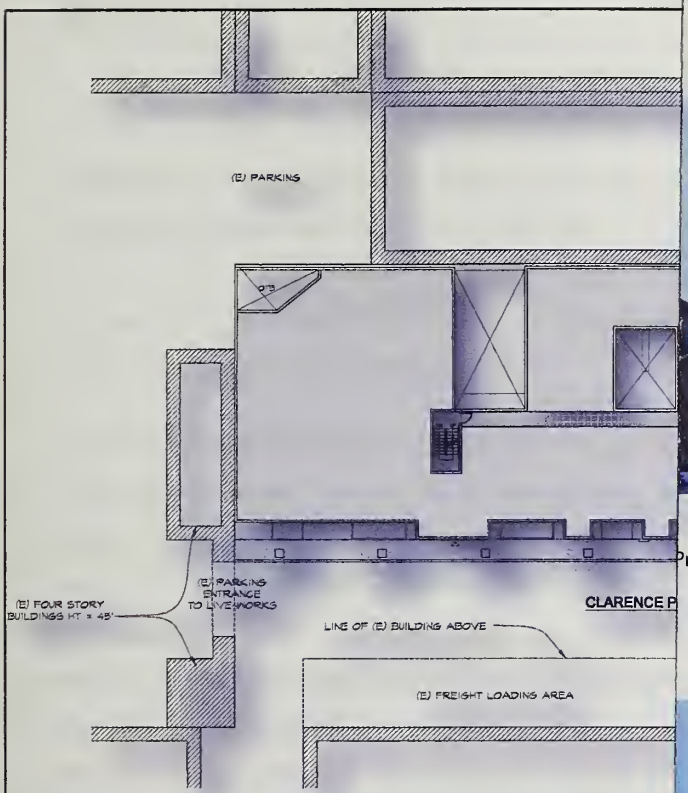
FIGURE 3: CONCEPTUAL DESIGN



Proposed Project

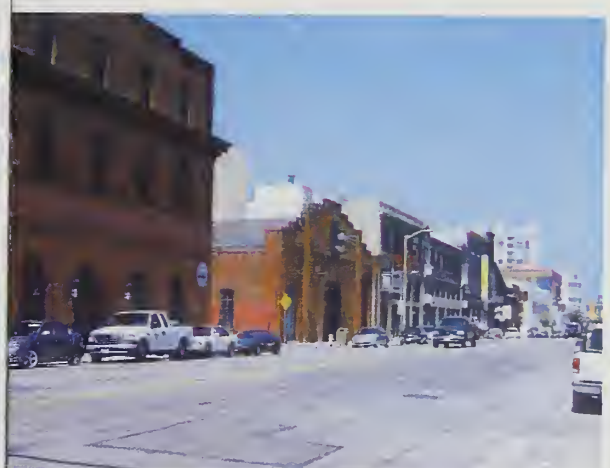
Perspective View Location 1

Existing Conditions

roposed Project

Perspective View Location 2

Existing Conditions



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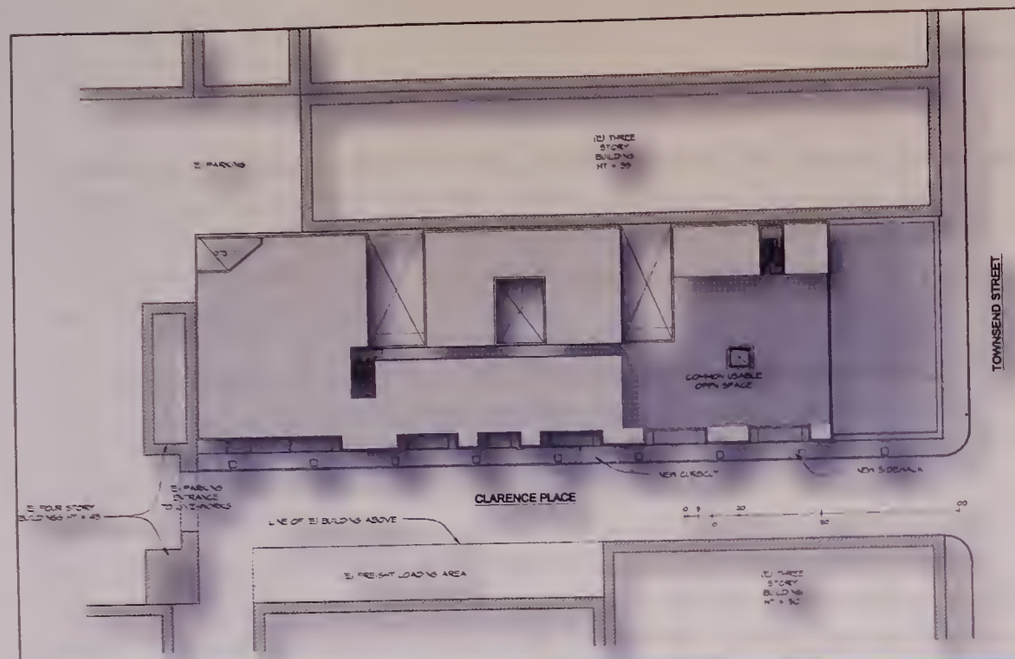
SOURCE: Martin Building Co.



Perspective View Location 1

Existing Conditions

Proposed Project

Perspective View Location 2

Existing Conditions

Proposed Project

Perspective View Location 3

Existing Conditions

Proposed Project

Perspective View Location 4

Exisitng Conditions

Proposed Project

Perspective View Location 5

Existing Conditions

Proposed Project

SOURCE: Martin Building Co.

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FIGURE 4: PROPOSED MASSING

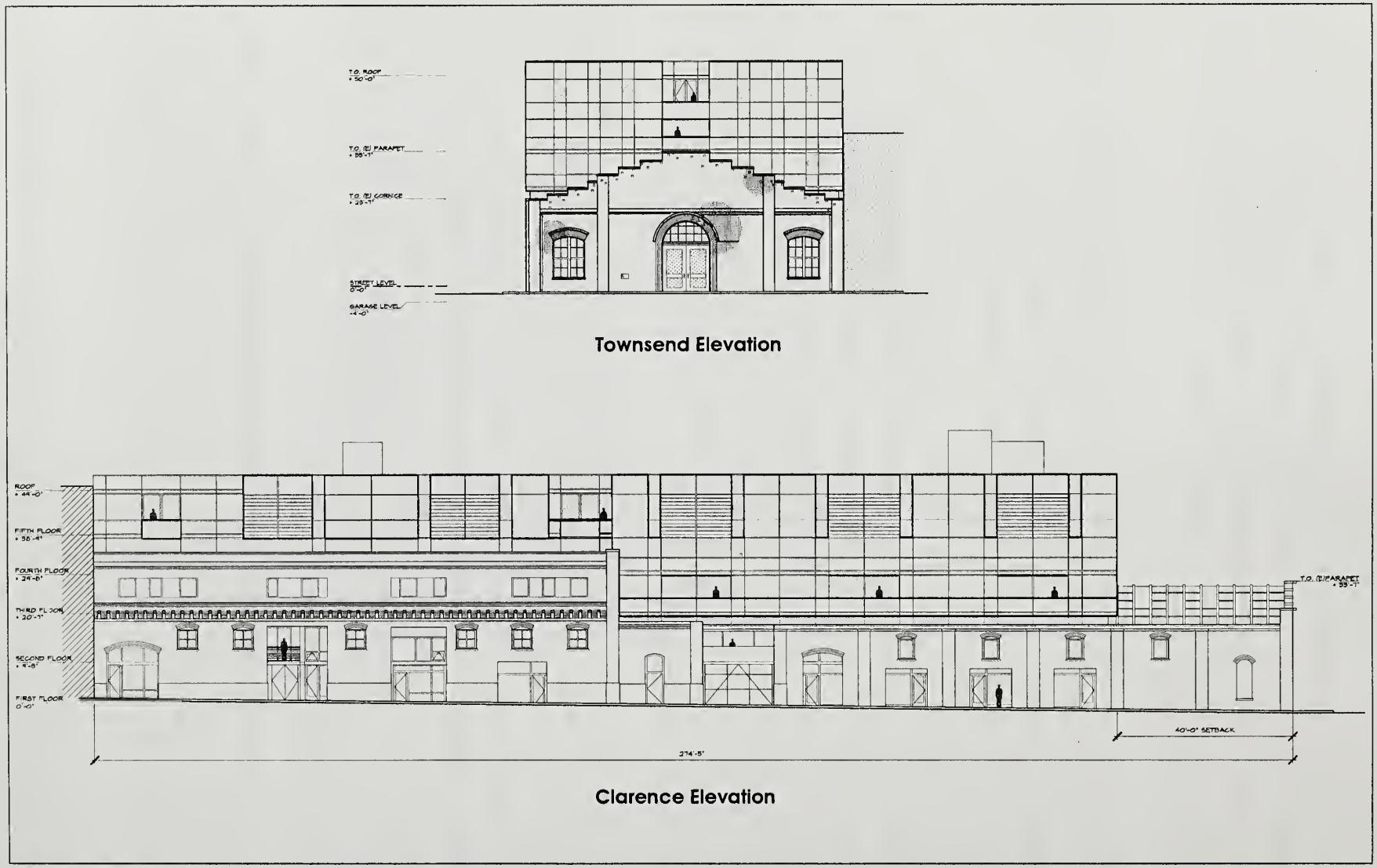
depiction of the conceptual design and the proposed massing. The proposed project also includes optional ground-floor retail uses. Twelve percent, or up to 10 units, of the total number of dwelling units would be designated as Below Market Rate (BMR) units as required by the City's Inclusionary Affordable Housing Program, set forth in Section 315 of the *San Francisco Planning Code (Planning Code)*.[5]

The California Electric Light Company Station B building is a Contributory Building within the South End Historic District, as established in the *Planning Code* Article 10. Built in 1888, the original multi-story structure was partially destroyed by the 1906 earthquake and fire, then rebuilt in its current configuration as a single-story brick warehouse divided into two sections or "volumes", with a pitched roof and stepped parapets along the front roofline. The front volume of the building occupies the lot to a depth of approximately 150 feet measured from the Townsend Street façade, and is enclosed by walls 20 feet in height along Clarence Place and the eastern property line, and a stepped parapet peaking at about 35 feet at the front façade on Townsend Street. The rear volume of the building is enclosed by 35-foot-high brick walls running along Clarence Place and the eastern property line, with two stepped parapets peaking at slightly below 50 feet in height located in the middle of the building and at the rear building façade. The existing roof surface peaks at 42 feet in height, approximately 8 feet lower than the highest point of the stepped parapet.

All new construction would be contained within the footprint of the existing structure and would rise above the existing roofline to a maximum height of 50 feet. New construction would include a below-grade parking garage and a five-story structure containing the proposed residential and retail uses (see Figures 5 and 6). This new structure would be set back 40 feet from the existing building's Townsend Street frontage. The project would include up to 71,500 gross square feet (gsf) of residential uses, up to 1,050 gsf of ground-floor retail uses fronting Townsend Street, approximately 5,400 gsf of common usable open space, and approximately 3,850 gsf of private open space provided in private balconies for 38 of the units. Table 1 summarizes the proposed project uses.

The majority of the existing building's walls and exterior façades would be preserved intact. On the Townsend Street façade, the original central brick archway would be restored to its 1899 condition, along with the original sliding wood "barn" doors and the two flanking openings. The two side openings would be infilled with reconstructed windows that match the 1899

[5] The project sponsor submitted an application for the project prior to July 18, 2006, the effective date for the increase in the required proportion of BMR units to 15 percent.



SOURCE: ian birchall + associates.

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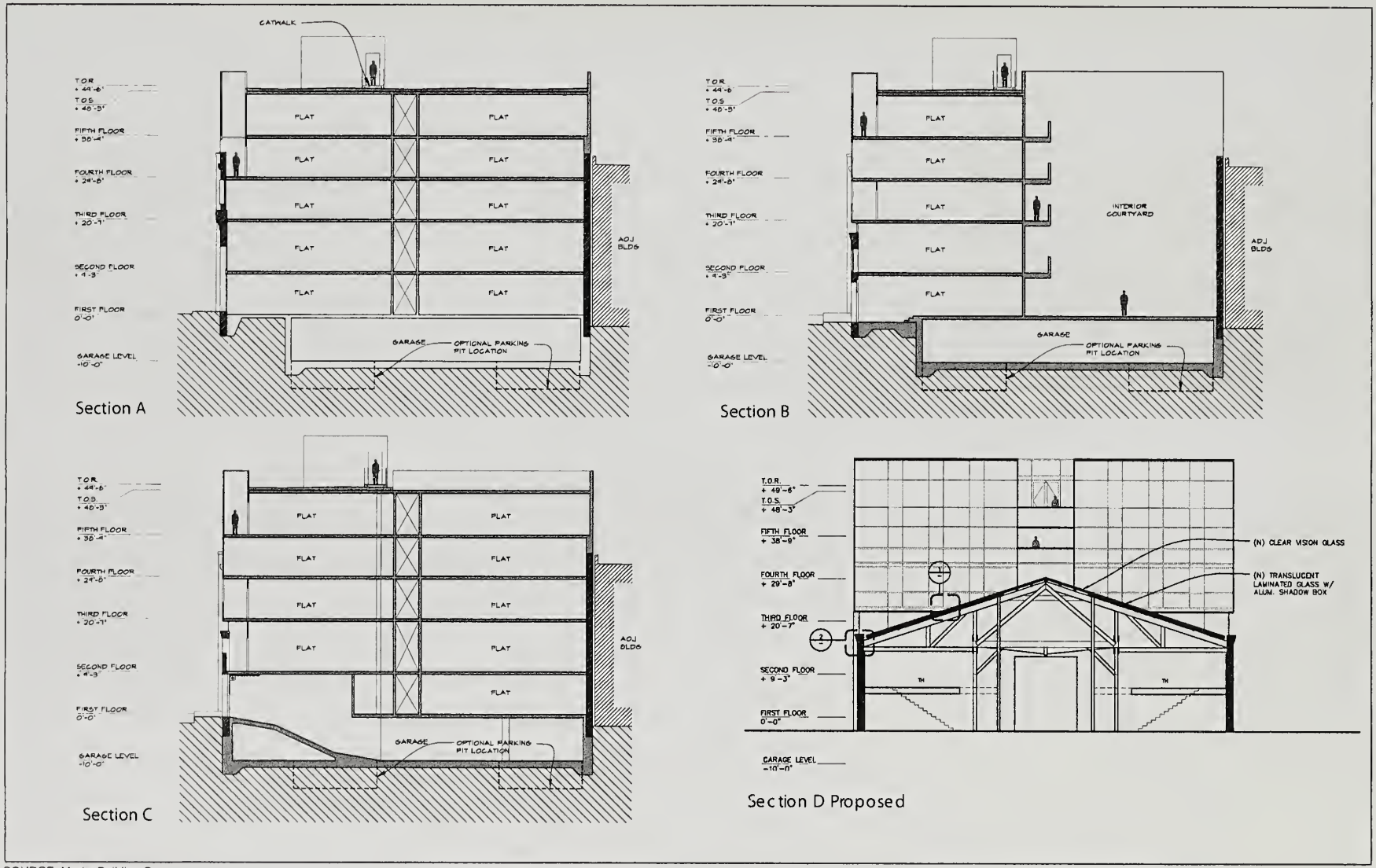
FIGURE 5: PROPOSED TOWNSEND STREET AND CLARENCE PLACE ELEVATIONS



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 6: PROPOSED BUILDING SECTIONS

TABLE 1
PROJECT DESCRIPTION

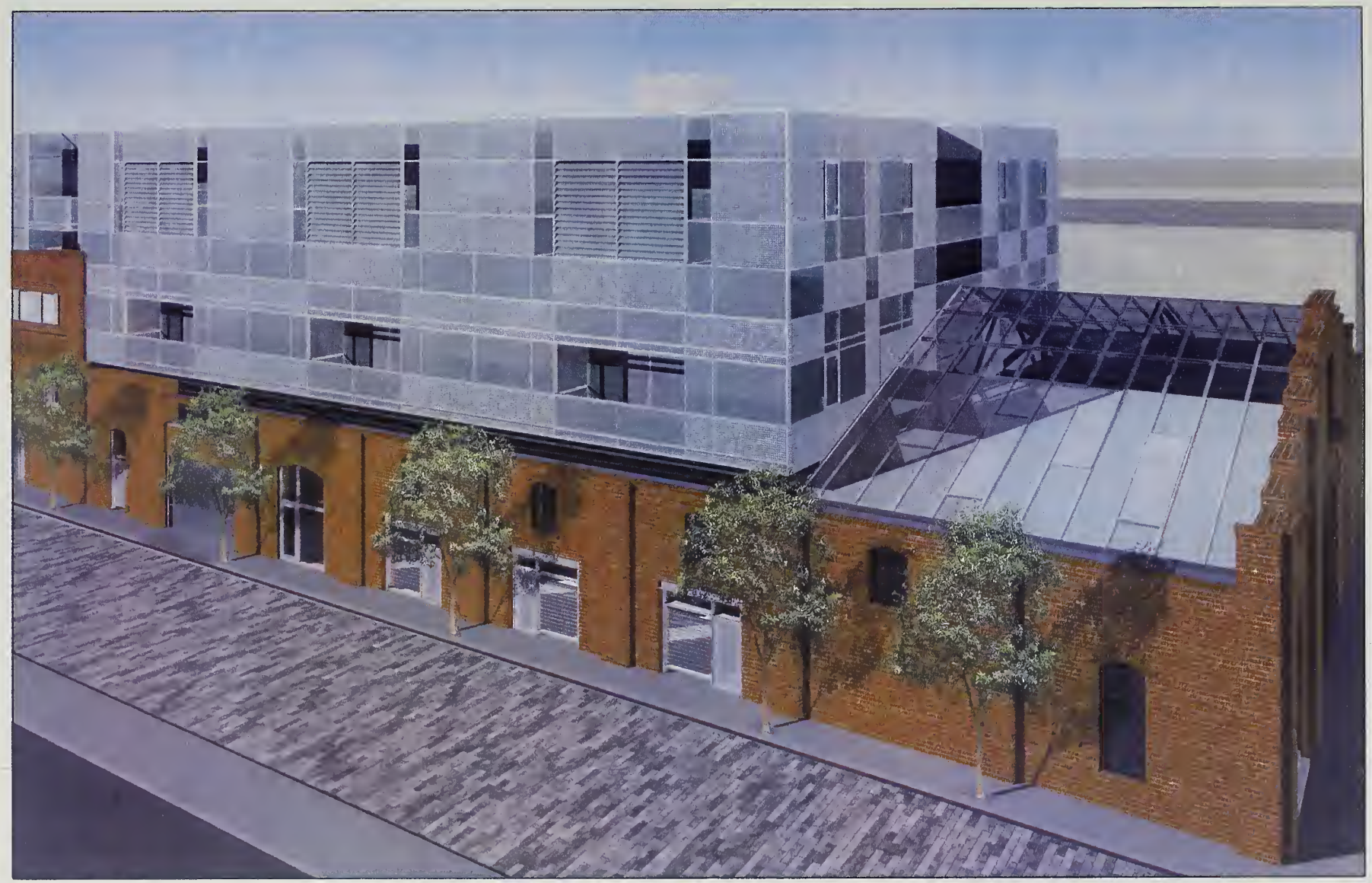
Category	Project Totals (sq.ft.)
Residential	Up to 71,500 sq.ft.
Retail	Up to 1,050 sq.ft.
Parking & Loading, Mech. & Storage	13,200 sq.ft.
Common Area, Circulation, and Building Service	10,600 sq.ft.
Open Space[1]	9,150 sq.ft.
Common Usable Open Space	5,400 sq.ft.
Private Usable Open Space	3,750 sq.ft.
TOTAL	**Approx. 96,350 sq.ft.**
Dwelling Units	Up to 85
Parking Spaces	74
Loading Spaces	0
Height of Buildings	50 feet
Number of Stories	5
Number of Buildings	1

Source: Martin Building Co., 2006.

Note: Open Space is not counted in total floor area.

window profile, which consisted of a multi-pane, single-hung, wood-sash window. On the east opening, a brick jack arch would be reconstructed to match the extant jack arch over the west opening. All historic brick on the Townsend Street façade would be patched and repaired and/or replaced with in-kind materials.

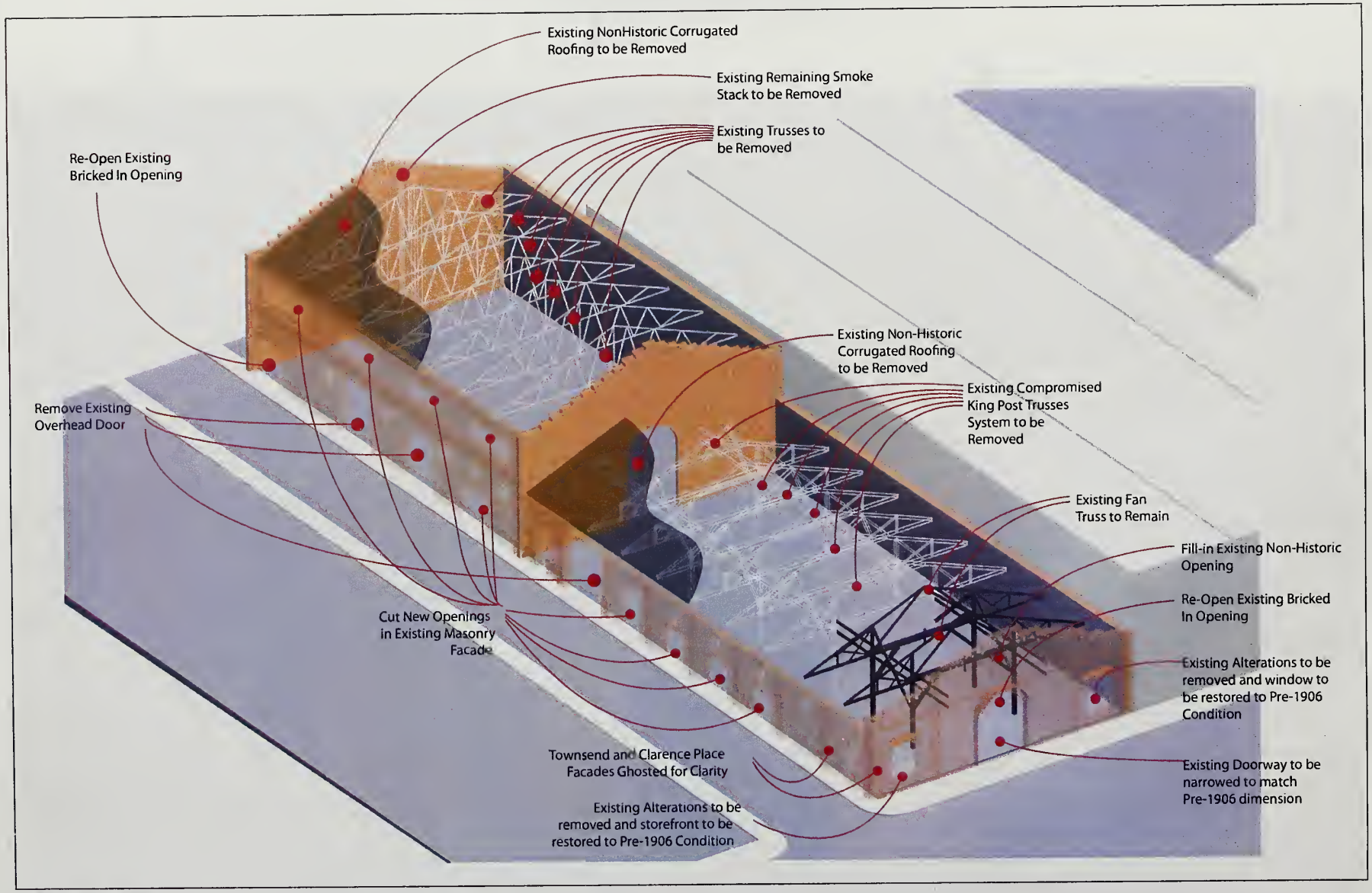
All of the existing steel trusses supporting the roof in the rear volume and the majority of the wooden trusses supporting the roof in the front volume would be removed; the first two bays of the building's 1907 post-and-beam wood truss system in the front volume would be preserved and restored. New window and doorway openings would be added along the Clarence Place façade in select locations (see Figures 7 and 8). The pitched roofline and volume of the front 40 feet of the original building (measured from Townsend Street) would be retained, with a new glass and steel roof replacing the non-historic corrugated roof. Behind this 40-foot setback, the proposed new structure would rise up to 50 feet in height, requiring the removal of the existing corrugated roof along with the interior remnants of the former smokestack in the rear volume of the building.



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 7: ARCHITECTURAL CONCEPT/ AERIAL PERSPECTIVE



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 8: PROPOSED MODIFICATIONS TO EXISTING STRUCTURE

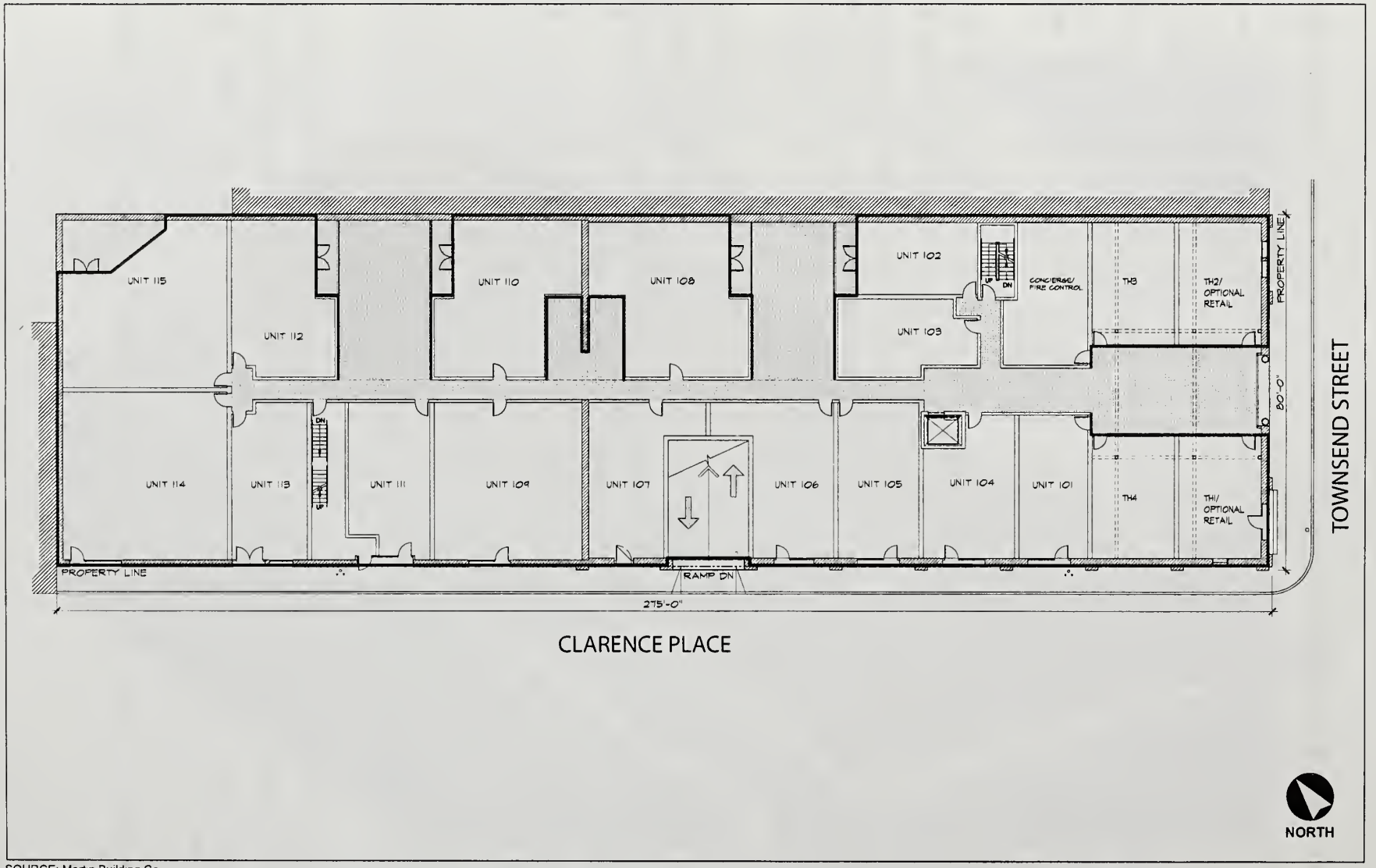
A total of five new residential entries would be cut into the existing Clarence Place façade (four openings in the front volume, and one opening in the rear volume). In addition, four rectangular "strip" windows would be added above the intermediate corbelled brick cornice of the rear volume. Existing windows along Clarence Place would remain and previously closed historic pedestrian and vehicular openings would be re-opened for use as residential entries. Units without individual entrances on Clarence Place would be accessed from the main entrance on Townsend Street and one common stairwell entry along Clarence Place. The new structure would be constructed with contemporary materials, including a glass and steel exterior skin, which would be visible above the existing roofline.

The residential component of the proposed project would contain a mixture of studio, one-bedroom, two-bedroom, and three-bedroom units. The exact configuration of units within the structure has not been determined at this time; figures in this document show 83 residential units, including two units that could be converted to an optional retail space. However, this document analyzes impacts based on a residential component of up to 85 units, including 51 studio and one bedroom units and 34 two-plus bedroom units.

Of the units provided by the proposed project, approximately 12 percent (or up to ten units) would be for-sale BMR units, as required by the City's Inclusionary Affordable Housing Program requirements. These BMR units would be required to be affordable to households earning up to 100 percent of the Area Median Income (AMI).

In addition to residential uses, the proposed project includes an optional retail component. The retail uses would be on the ground floor near the Townsend Street entrance, within the existing structure. There would be two separate optional retail spaces, one on each side of the Townsend Street entrance, with a total floor area of about 1,050 square feet. The retail uses would be constructed at grade, with pedestrian access through the main entrance on Townsend Street.

The project would include a central walkway starting from the building's Townsend Street entrance (see Figure 9). With the retail option, the portion of the walkway accessing the retail space would be open to the public during business hours. Residential common usable open space would be provided in three separate courtyards located on the ground floor, which would be open to the floors above (see Figures 10, 11, 13, and 14). The courtyards would be connected to the Townsend Street entrance by a central walkway. Additional common usable



SOURCE: Martin Building Co.

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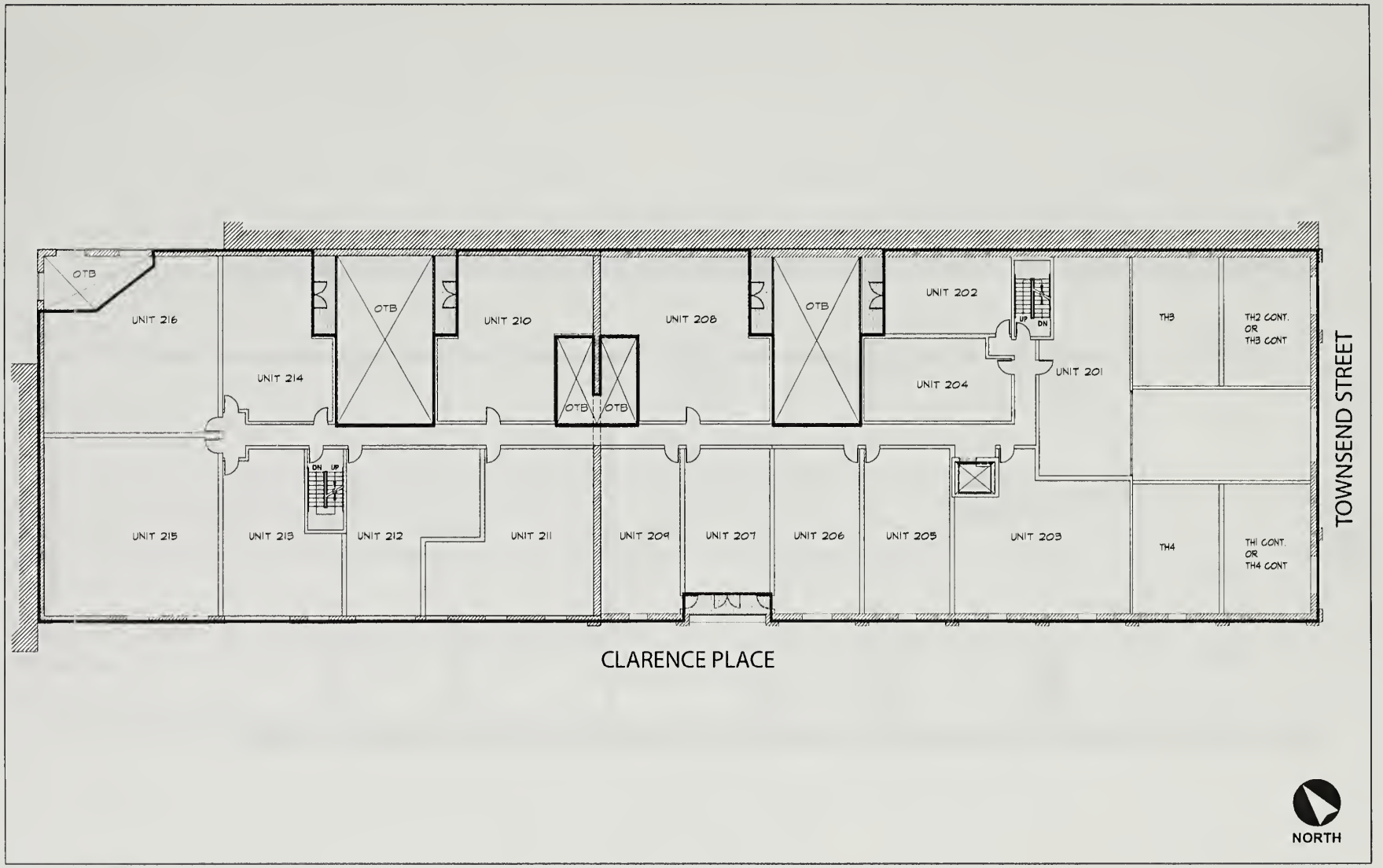
FIGURE 9: FIRST (GRADE) FLOOR PLAN



SOURCE: Martin Building Co.

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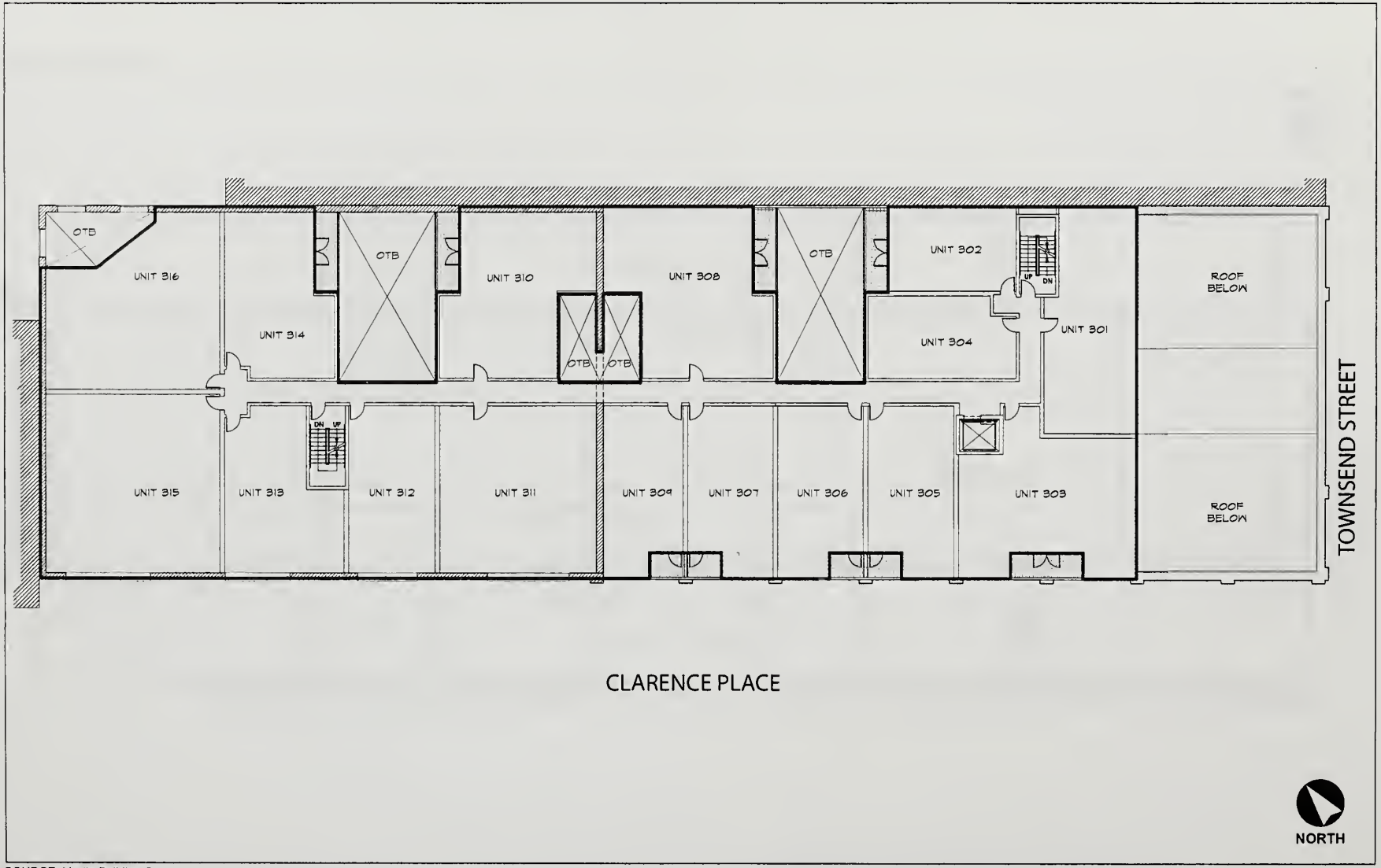
FIGURE 10: SECOND FLOOR PLAN



SOURCE: Martin Building Co.

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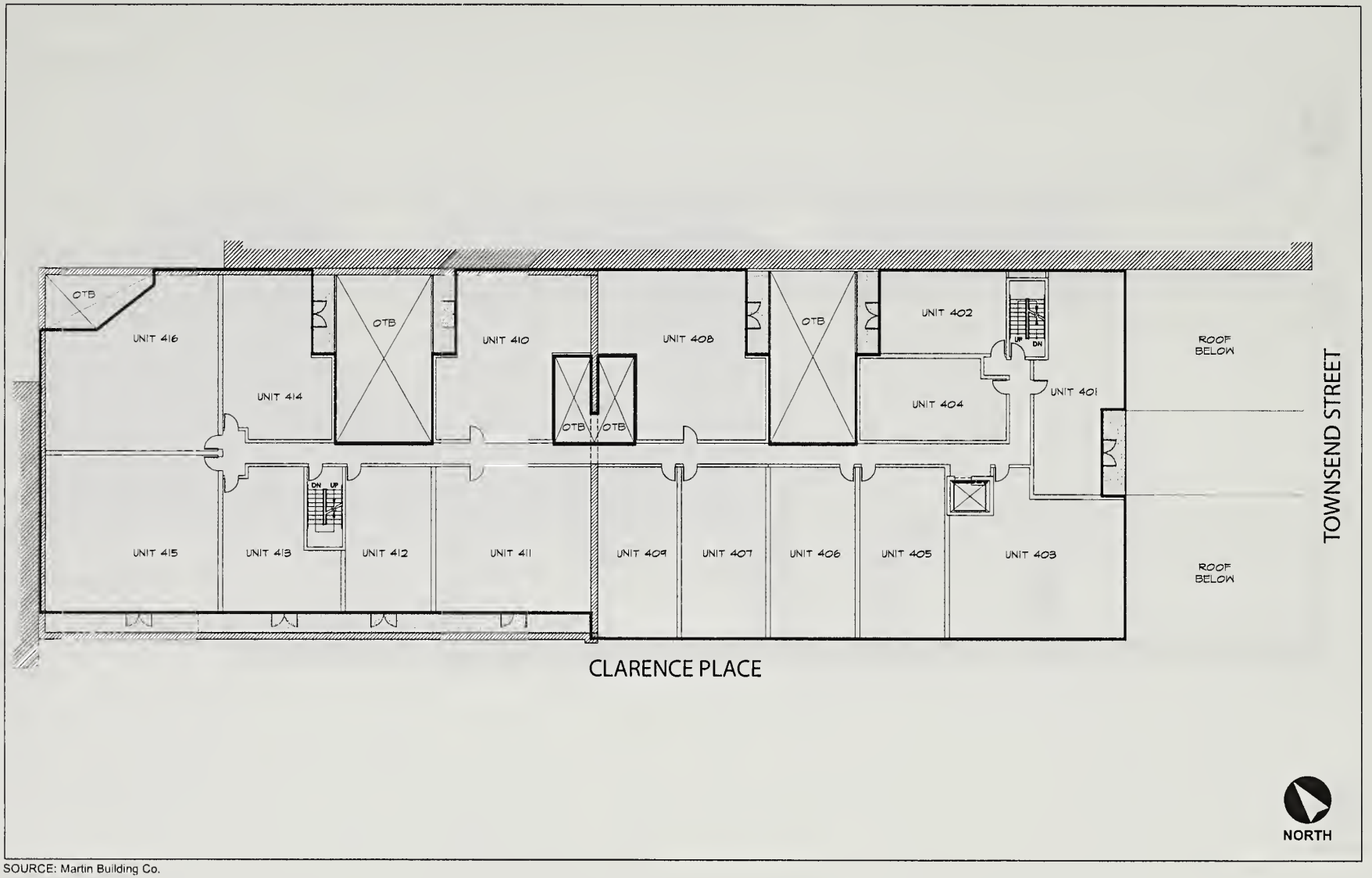
FIGURE 11: THIRD FLOOR PLAN



SOURCE: Martin Building Co.

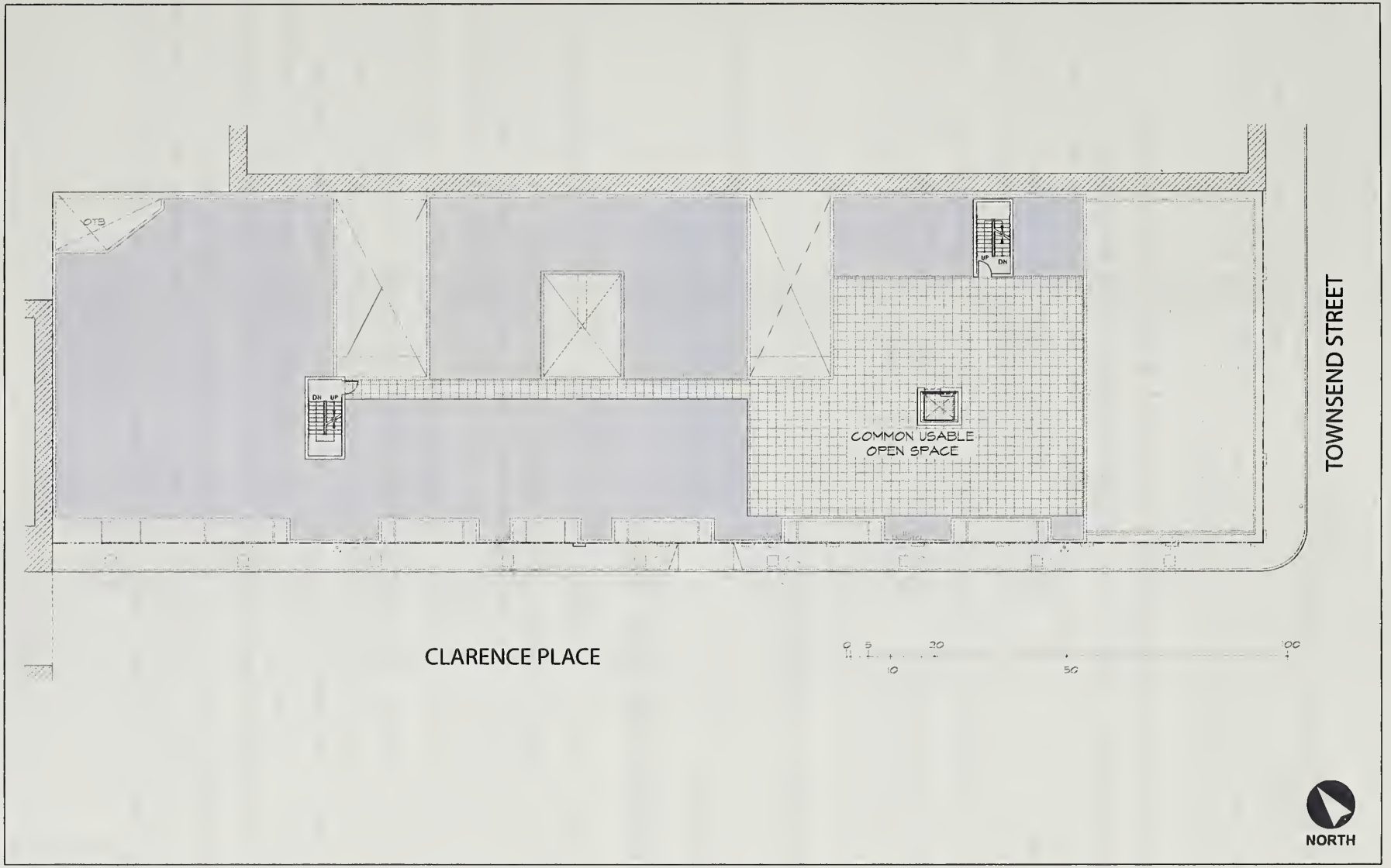
178 TOWNSEND STREET PROJECT

FIGURE 12: FOURTH FLOOR PLAN

SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 13: FIFTH FLOOR PLAN



SOURCE: Martin Building Co.

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FIGURE 14: ROOF PLAN

open space would be provided on a rooftop deck (see Figure 14). The courtyards and roof deck combined would provide 5,400 gsf of proposed common usable open space. Private usable open space would be provided in private balconies for 38 of the units. The project would also construct a new public sidewalk along Clarence Place.

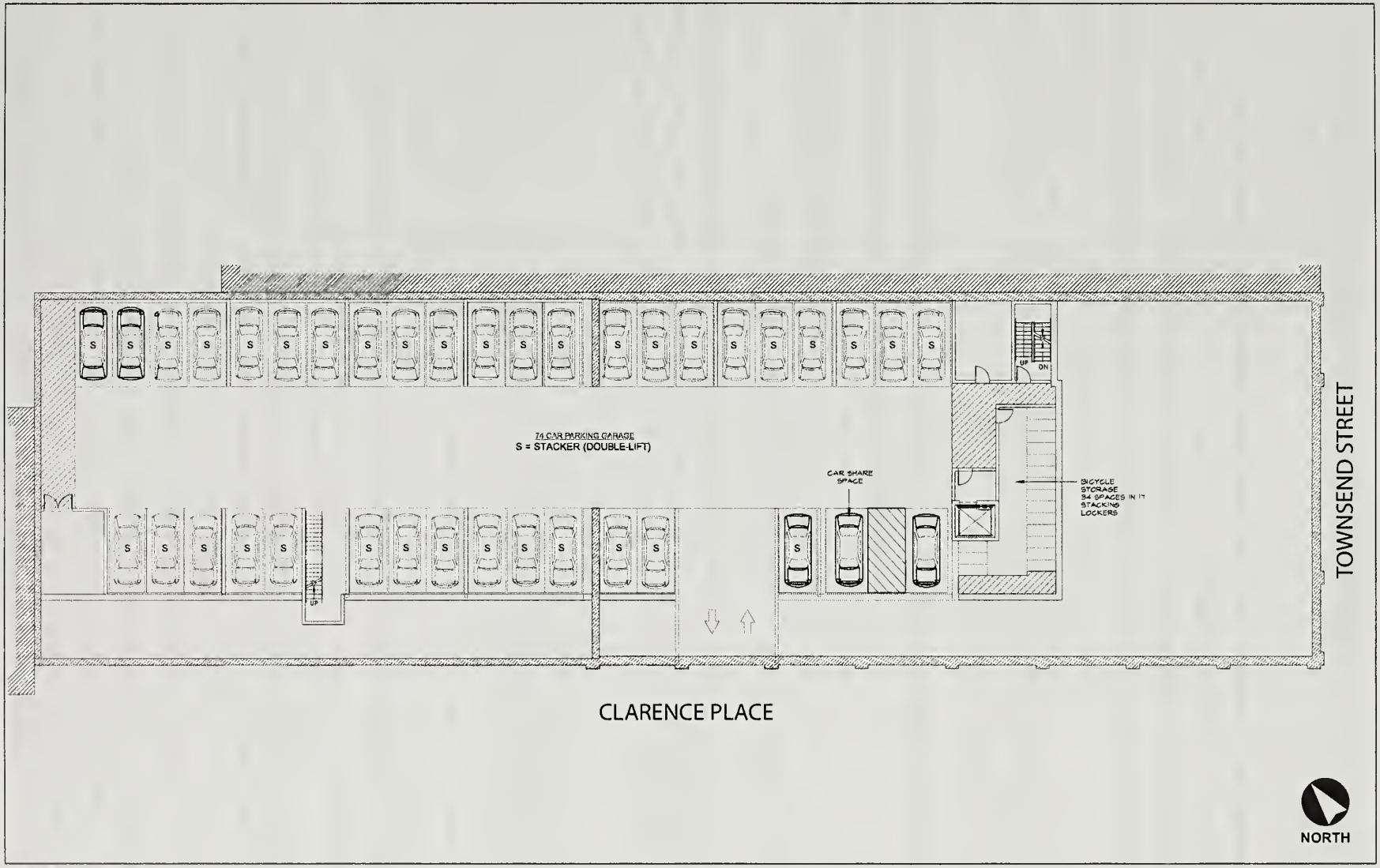
The partially below-grade parking garage would provide a total of 74 parking spaces, with 72 parking spaces provided in two-car parking stacker systems. The parking garage would also provide two ADA-accessible spaces, one car-share space, and 33 bicycle parking spaces in stacked lockers. The ground would be excavated beneath the existing structure to accommodate the parking garage, as shown in Figure 15. Garage access would be provided through an existing opening located mid-block on Clarence Place, and controlled by a security gate. The driveway/aisle area of the parking garage would be approximately 10 feet below grade. Additional excavation to a depth of 4 feet may be required for parking lift pits to provide access for the proposed stackers.

C. PROJECT SCHEDULE

Project construction is anticipated to begin in 2008 and would require approximately 16 to 18 months to complete.

D. PROJECT SETTING

Land uses in the immediate vicinity of the project site include a mix of residential, recreation, retail, and office uses, with limited light industry and warehouse uses. On the northeastern corner of Townsend Street at the Third Street intersection is a one-story building and storefront. Moving east along the block at 180 Townsend, there is a three-story brick office building of a similar age and character to the building on the project site. The project site is across Clarence Place from 180 Townsend. Immediately adjacent and to the east of the project site is a three-story historic warehouse building that has been converted to a live/work building. Continuing towards Second Street, there are four mixed-use buildings of similar heights and massing; these buildings form a uniform street wall, with no setback, along the northern side of Townsend Street. The buildings are two- to five-story refurbished warehouses (some with contemporary architectural details such as stucco and glass facades). At the southeast corner of Townsend Street and Third Street is a McDonald's restaurant with a drive-through lane and surface parking. There is a 10-story mixed-use multi-family residential and commercial building



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 15: BASEMENT FLOOR PLAN

immediately east of the McDonald's and directly across the street from the project site at 177 Townsend Street.

Buildings along the southern side of Townsend Street between Third Street and Second Street are substantially taller than the buildings on the northern side of Townsend Street, averaging between eight and ten stories, consistent with the 105-foot height limit on that side of the street. Most were recently constructed, but the style of the buildings is similar to older warehouses found in the area; the buildings have large, solid massing with details such as tall grid windows and brick detailing. Like the northern side of Townsend Street on this block, buildings on the southern side of Townsend Street do not have setbacks from the street. Most buildings in this block abut the buildings to either side.

Directly north of the project site, behind the existing on-site building and abutting its northern wall, is a four-story live/work residential building with surface parking access from Clarence Place. Other distinctive buildings in the immediate vicinity include a 16-story mixed-use building with a ground-level Borders Bookstore and housing/office uses above (across the intersection of Townsend Street and Third Street to the south and southwest).

Within the larger neighborhood context, mixed land uses are also prevalent, with a growing number of high-density residential projects. Three blocks north of the project site across Brannan Street is the South Park area with residential, retail, and recreational park space. AT&T Park, the San Francisco Giants ballpark, is on King Street, one block south of the project site. The northeasterly portion of the Mission Bay Project Area is near the project site, beginning at Third and Townsend Streets. The 303-acre Mission Bay area extends south to Mariposa Street, and is being developed with mixed-use residential, commercial, medical and bioscience research, office, and community facilities. The Caltrain Depot, a major transit facility serving the Peninsula, is two blocks west of the project site at Fourth and Townsend Streets. The project site is served by several MUNI bus lines as well as the N-Judah MUNI Metro light rail line on King Street. The new T-Third light rail line also serves the area.

The project site is within an SLI zoning district, which is intended to retain existing general commercial, manufacturing, home and business service, arts uses, light industrial activities, and small design professional office firms, by excluding general office and most residential uses. Existing group housing and dwelling units are protected from demolition or conversion to nonresidential use, and development of group housing, single room occupancy (SRO) units, and dwelling units affordable to low-income households are permitted as conditional uses. Residential uses other than group housing, SROs, and dwelling units affordable to low income households are not permitted in the SLI district. However, in the SLI district pursuant to

Section 803.5(c) of the *Planning Code*, any use which is permitted as a principal or conditional use within the Service/Secondary Office (SSO) District may be permitted as a conditional use in Contributory Buildings within any designated historic district within the South of Market Base District.[6] General office, hotels, movie theaters, nighttime entertainment, and adult entertainment uses are not permitted. One block south of Townsend Street is an M-2 district. Three blocks east of the project site is an SSO (Service and Secondary Office) designation. Three blocks north of the project site, across Brannan Street, is South Park, a public open space, surrounded by the mixed-use SPD (South Park District).

The project site is within a 50-X Height and Bulk District, which limits the height of buildings within the zone to 50 feet. On the south side of Townsend Street, directly across from the project site, is a 105-F Height and Bulk District, limiting the height of buildings within this zone to 105 feet. North of the project site, across Brannan Street, is a 40-X Height and Bulk District that surrounds South Park, with the height limited to 40 feet.

E. PROJECT OBJECTIVES

As described above, the proposed project seeks to preserve the California Electric Light Company Station B building and convert it from a parking garage to a residential building. The proposed project would provide up to 85 units of housing. The project would also provide retail uses as well as parking space, open space, common area, and building service space.

The following are the project sponsors' objectives for the proposed project:

- Rehabilitate the California Electric Light Company Station B building and convert to residential and retail uses, as well as parking space, open space, common area, and building service space;
- Provide up to 85 units of housing;
- Provide 12 percent BMR units to contribute to the City's supply of moderate income housing;
- Provide on-site parking to meet the needs of the project's residents; and
- Create a high quality, well designed project that is responsive to the surrounding neighborhood.

[6] The South of Market Base District is a general zoning district defined in Section 102.5 of the *Planning Code* that contains the RED, RSD, SPD, SLR, SLI and SSO Districts.

F. PROJECT APPROVALS

The proposed project would require approval of a Certificate of Appropriateness under *Planning Code* Section 1006 for alteration of a Contributory Building in the South End Historic District. Within this historic district, any alterations requiring a permit and/or any exterior changes visible from a public street require a Certificate of Appropriateness. Also, a Certificate of Appropriateness is required for cleaning masonry with abrasives or chemically waterproofing masonry surfaces. The Certificate of Appropriateness process for alterations requires review by the Landmarks Preservation Advisory Board, a public hearing, and final approval from the Planning Commission. No construction or alteration permits would be granted until a Certificate of Appropriateness has been granted.

The approvals that would be required in accordance with the *Planning Code* are listed below. The relevant *Planning Code* section, which refers to these approval requirements, is cited for each approval item.

- Conditional Use authorization for the provision of market-rate residential units in a Contributory Building within the South End Historic District pursuant to *Planning Code* Section 803.5(c);
- Zoning Administrator determination regarding a variance in the number and type of parking spaces pursuant to *Planning Code* Section 151, the residential rear yard requirement (Planning Code Section 134(a)), and, potentially, for open space and dwelling unit exposure requirements;
- The proposed project would also require issuance of permits by the Department of Building Inspection (DBI) for building construction and the Department of Public Works (DPW) for improvements to the Townsend Street sidewalk and Clarence Place public right-of-way.

III. ENVIRONMENTAL SETTING AND IMPACTS

On the basis of an Initial Study published on January 27, 2007, the San Francisco Planning Department determined that an EIR was required for the proposed 178 Townsend Street Project. According to the Initial Study, impacts related to cumulative land use, cultural resources (historic resources), and transportation and circulation could be potentially significant. These subjects are discussed in Sections III.A, III.B, and III.C below. Growth inducement and other CEQA considerations are discussed in Section V.

The Initial Study determined that certain effects of the proposed project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included in the project. These included impacts related to aesthetics, cultural resources (except historic resources), noise, air quality, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards/hazardous materials, mineral/energy resources, and agricultural resources. This EIR does not discuss these effects (refer to Appendix A for the Initial Study).

A. CUMULATIVE LAND USE

This section analyzes the proposed project's potential contribution to cumulative land use effects in the larger Eastern Neighborhoods planning area by analyzing whether the proposed project would contribute to a substantial, adverse change in the area's land use character by adversely affecting the City's ability to meet its potential future PDR space needs or its housing needs as expressed in the City's *General Plan.* A detailed description of the Project site, surrounding land uses, and other existing conditions or project impacts can be found in Chapter II, Project Description and in the Initial Study in Appendix A.

SETTING

EXISTING LAND USES AND ZONING IN THE PROJECT VICINITY

The project site is located in an SLI district and 50-X Height & Bulk District within the South of Market Base District and Area Plan. The intent of the SLI district is to retain light industrial uses by excluding general office and most residential uses. In the SLI district, permitted uses include general commercial, manufacturing, home and business service, arts uses, light industrial activities, and small design professional office firms. Group housing, SRO units, and dwelling units affordable to low income households are permitted subject to conditional use (CU) authorization. Other residential uses are not usually allowed in SLI Districts. However, pursuant to Planning Code Section 803.5(c), any use which is permitted as a principal or CU within the Service/Secondary Office (SSO) District may be permitted as a CU in Contributory Buildings within any designated historic district within the South of Market Base District. The existing building on the project site, the California Electric Light Company Station B building, is a Contributory Building in the South End Historic District. Market-rate dwelling units are a conditional use in the SSO district, and therefore may be authorized as a conditional use at the project site, provided the Contributory Building is protected and rehabilitated.

Existing land uses in the immediate vicinity of the project site include a mix of high-density residential, recreation, retail, and office uses, with limited light industry and warehouse uses. Within the larger neighborhood context, mixed land uses are also prevalent, with a growing number of high-density residential projects. Approximately 500 feet north of the project site across Brannan Street is South Park, a neighborhood park surrounded by a mix of residential, retail, and small office uses. AT&T Park, the San Francisco Giants ballpark, is on King Street, one block south of the project site. The northeasterly portion of the Mission Bay Project Area is near the project site, beginning at Third Street and Townsend Street. The 303-acre Mission Bay area extends south to Mariposa Street, and is being developed with mixed-use residential,

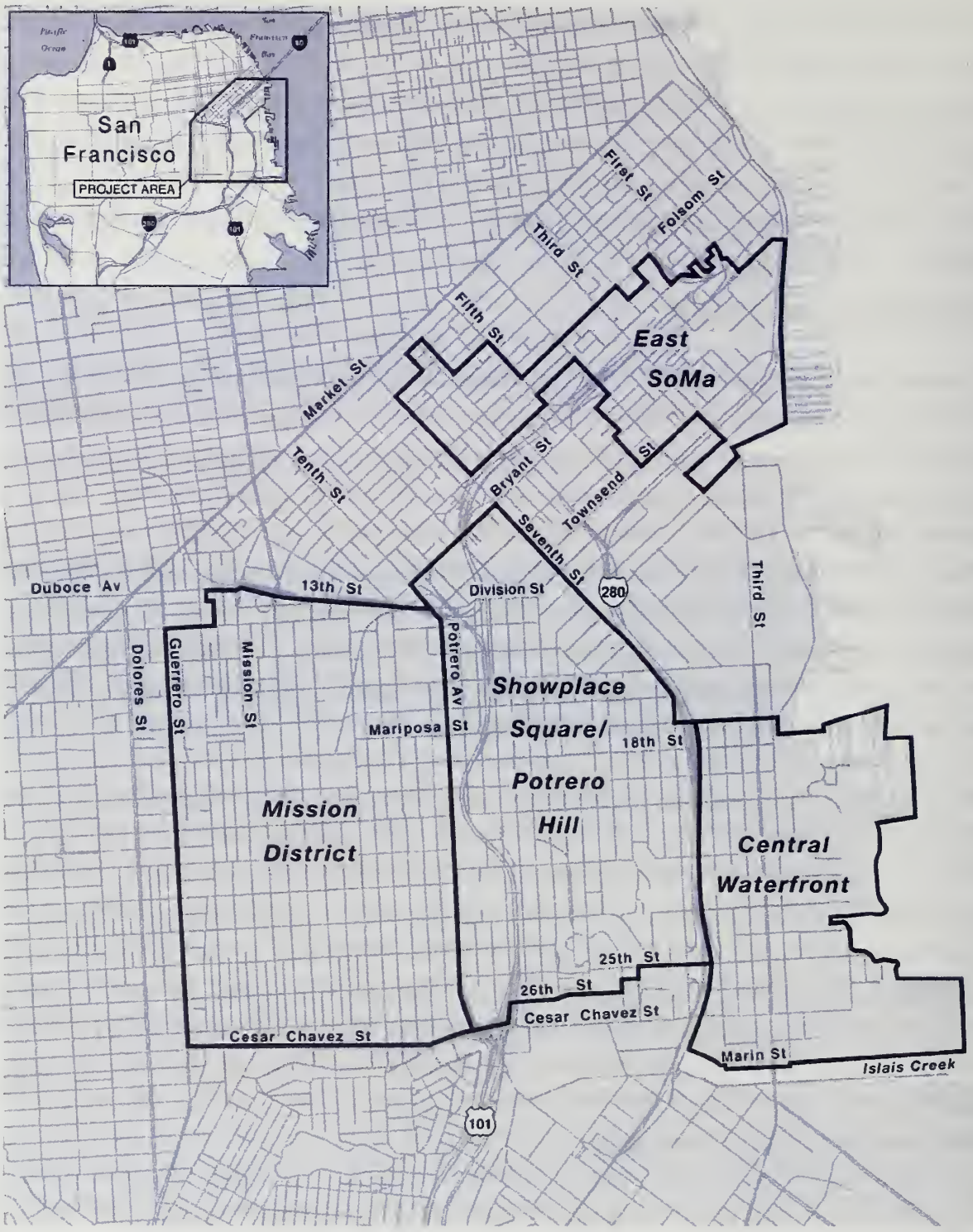
commercial, medical and bioscience research, office, and community facilities. The Caltrain Depot, a major transit facility serving the Peninsula, is two blocks west of the Project site at Fourth Street and Townsend Street. The project site is served by several MUNI bus lines as well as two MUNI Metro light rail lines and the Caltrain heavy rail line at the King Street station. The MUNI Metro lines serve The Embarcadero and the Market Street corridor. The new T-Third light rail line, which started full service in April 2007, connects the Third Street corridor to the south.

EAST SOMA DEMOGRAPHICS

The project site is within the East South of Market area (East SoMa), in an area of the city collectively referred to as the "Eastern Neighborhoods." The larger Eastern Neighborhood context and rezoning process is discussed further below, under the section titled "Eastern Neighborhood Rezoning and Community Plans." The Eastern Neighborhoods Plan Areas are shown in Figure 16. The East SoMa plan area is bounded generally by Folsom Street on the northwest, the Rincon Hill Plan area (Second Street) on the east, Townsend Street on the south, and Fourth Street on the west, with an extension to the northwest bounded by Harrison Street, Seventh Street, Mission Street, Sixth Street (both sides), Natoma Street, Fifth Street, and Folsom Street (Figure 16 shows the plan area boundaries for the *Draft East SoMa Area Plan* in relation to the other three Eastern Neighborhoods Area Plans).

Demographic information summarized in this discussion was drawn from the Draft *San Francisco's Eastern Neighborhoods Rezoning Socioeconomic Impacts* report prepared for the Planning Department by Hausrath Economics Group on March 2007 (hereinafter referred to as the *Draft Hausrath Report*). Approximately 14 percent, or 9,516 residents, of the Eastern Neighborhoods' estimated 70,000 residents lived in East SoMa in 2000. Generally, the age distribution of the population in the Eastern Neighborhoods mirrors that of the City overall, although a slightly higher concentration of older residents live in the East SoMa. Asian and Pacific Islander residents are generally under-represented in the Eastern Neighborhoods, with the exception being East SoMa, where just under one-third of the population is Asian or Pacific Islander—about the same as the Citywide average.

At the end of 2004, there were almost 30,000 housing units in the Eastern Neighborhoods, of which approximately 22 percent, or 6,700 units, were located in the East SoMa. Of these housing units, nearly 90 percent were renter-occupied, the highest percentage of any of the Eastern Neighborhoods planning areas. The total share of renter-occupied housing in East SoMa is declining as new construction increases the number of owner-occupied units.



SOURCE: Eastern Neighborhoods Initial Study.

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FIGURE 16: EASTERN NEIGHBORHOODS PLANNING AREAS

Government-subsidized, below market-rate (BMR) affordable housing represents a relatively large share of the existing housing inventory in East SoMa, where it constitutes 11 percent of total housing stock and 39 percent of all publicly-subsidized, BMR affordable housing in the Eastern Neighborhoods. Several such projects are located near the proposed project, including the Steamboat Point and Delancey Street developments in South Beach.

With household incomes at less than 80 percent of the citywide median, almost half of East SoMa households fall into the low income and very low income categories. The poverty rate in East SoMa (21 percent) is approximately twice the citywide average of 11 percent, and more than the 17 percent average for the Eastern Neighborhoods as a whole.

In 2000, about 24 percent (17,587 jobs) of total Eastern Neighborhoods employment (72,646 jobs) was located in East SoMa. Management, information and professional services (MIPS) makes up the greatest share of East SoMa employment, with 8,688 jobs or 49 percent of total East SoMa employment in 2000. PDR was the second largest source of employment, at 37 percent or 6,579 jobs. By contrast, few residents of East SoMa are actually employed in PDR businesses. Instead, the great majority of East SoMa residents work in relatively higher-education, high-wage employment sectors, with the "professional, scientific, management, administrative services" category topping the list, followed closely by "Finance, insurance and real estate." Notably, the "manufacturing" category does not rank among the top four employment sectors for residents of East SoMa.

As of May, 2006, there were 43 residential and nonresidential projects in the development pipeline in the East SoMa Plan Area, 85 percent which have been approved. Collectively, new pipeline development would add about 2,300 residential units to the area. Due to the existing Residential Inclusionary Affordable Housing Program required through Sections 315-315.9 of the *Planning Code*, a minimum of between 10 and 15 percent of all new housing units built in the neighborhood would be below market rate (BMR) units. The non-residential pipeline consists of about 96,000 sf of retail space and 20,000 sf of medical space. The current development pipeline would result in the cumulative loss of approximately 185,000 sf of PDR space, representing three percent of the total amount of PDR space in the plan area, as well as the loss of some existing office space. Most of the demolition and/or conversion of PDR space (75 percent of the total) would result from projects that are already approved and in some state of the building permit or construction process.

DRAFT EAST SOMA AREA PLAN

The *Draft East SoMa Area Plan* is intended to "guide the location, intensity and character of new and expanded business and residential activity, the buildings which house these activities, and the public facilities and resources provided within the area covered in the Plan. In addition to recommending development policies and zoning rules, the Plan recommends measures to be undertaken by other city agencies that would improve the physical environment and general neighborhood livability of the area."[7] The *Draft East SoMa Area Plan* recommends rezoning in the area to realize its goals of achieving an appropriate mix of uses in the area, encouraging diversity in the mix of businesses and residents, and improving community facilities and streets. Pursuant to the September 6, 2007, draft Eastern Neighborhood zoning maps published by the Department, the project site is proposed for inclusion in a new Urban Mixed Use (UMU) zoning district, under which a variety of nonresidential uses, including retail, PDR and small office uses would be permitted, as well as the project's proposed mix of market-rate and inclusionary BMR residential units, but solely in Historic Buildings, including Contributory Buildings, similar to the existing provisions in Section 803.5(c) described above. Thus, the proposed project would conform to both the current draft zoning for the *East SoMa Area Plan* as well as existing zoning. The proposed project would therefore not conflict with adopted or proposed land use plans

EASTERN NEIGHBORHOODS REZONING AND COMMUNITY PLANS

The Department published a DEIR on June 30, 2007, for the *Eastern Neighborhoods Rezoning and Area Plans* (the Eastern Neighborhoods DEIR).[8] This DEIR studies the potential environmental effects directly related to the future rezoning of three of the four area plans identified in the Department's February 2003 draft *Community Planning in the Eastern Neighborhoods: Rezoning Options Workbook* (the *Workbook*): Showplace Square/Potrero Hill, the Mission District, and the eastern portion of the South of Market (East SoMa), in addition to the draft Central Waterfront Area Plan, which was originally part of the Better Neighborhoods program. The Eastern Neighborhoods rezoning is intended to support housing development in some areas currently zoned to allow industrial uses while preserving an adequate supply of space for existing and future PDR employment and businesses. A key component of the proposed rezoning would be

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[7] San Francisco Planning Department, *Draft East SoMA Area Plan*, September 6, 2007. This plan is available by request from the Planning Department, 1650 Mission Street Suite 400, or by accessing http://www.sfgov.org/site/uploadedfiles/planning/Citywide/pdf/SoMa_Area_Plan_DRAFT07.PDF

[8] San Francisco Planning Department, *Eastern Neighborhoods Rezoning and Area Plans Draft Environmental Impact Report*, June 30, 2007. This document is available for review at the Planning Depart, 1650 Mission Street, Suite 400, as part of Case File No. 2004.0160E, or by accessing http://www.sfgov.org/site/planning_index.asp?id=25288.

the introduction of new zoning districts, including districts that would permit PDR uses, in combination with commercial uses; districts mixing residential and commercial uses and residential and PDR uses, and new residential-only districts. The districts would replace existing industrial, commercial, residential single-use, and mixed-use districts. The DEIR evaluates the three rezoning options (A, B, and C) outlined in the workbook, plus a 'No Project' alternative for consideration. The options vary by the degree to which they would permit lands currently zoned to allow industrial uses to be converted to residential or mixed-use districts: Option A would permit the least amount of such conversion, while Option C would permit the greatest conversion. The area plans being developed for each of these four neighborhoods, including the *Draft East SoMA Area Plan*, represent recommendations that have been drawn from the range of possibilities described in these three options.

The proposed rezoning would also include changes to existing height and bulk districts in some areas. Because the project site is located within the Eastern Neighborhoods rezoning area in a zoning district (SLI) that currently permits a range of PDR uses, this project EIR analyzes the proposed project's potential to contribute to cumulatively significant land use effects in the Eastern Neighborhoods. Among other topics, the Eastern Neighborhoods DEIR assesses the significance of the cumulative land use effects of the Eastern Neighborhoods rezoning by analyzing its effects on the City's ability to meet is future PDR space needs as well as its ability to meet its housing needs as expressed in the City's *General Plan*.

In May 2004, the Planning Commission adopted an updated version of the *Housing Element* of the City's *General Plan* that assesses the City's housing need and contains objectives and policies intended to address those needs.[9] As discussed in the Summary of this EIR, the Department published the *EPS Report*[10] in April 2005, and in October 2005 a document summarizing the *EPS Report's* findings and providing an overview of the implications and options for proposed permanent zoning controls in the Eastern Neighborhoods area.[11] In March 2007, the

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9 San Francisco Planning Department, San Francisco *General Plan, Housing Element*, Adopted May 13, 2004. This report is available online for public review at: *http://www.sfgov.org/site/planning_index.asp?id=41412*, accessed for this report on March 6, 2007.

10 Economic & Planning Systems, Inc., Final Report, *Supply/Demand Study for Production, Distribution, and Repair (PDR) in San Francisco's Eastern Neighborhoods* prepared for the City and County of San Francisco, April 15, 2005. This report is available online for public review at: *http://www.sfgov.org/site/uploadedfiles/planning/Citywide/pdf/14158FinRpt1.pdf*, accessed for this report on March 6, 2007.

11 San Francisco Planning Department, Eastern Neighborhoods Proposed Permanent Zoning Controls: An Overview, October 6, 2005. This report is available online for public review at: http://www.sfgov.org/site//uploadedfiles/planning/Citywide/pdf/Staff%20Report.pdf, accessed for this report on March 29, 2007.

Department published the *Draft Hausrath Report.*[12] Taken as a whole, the *Housing Element, EPS Report,* the Department's summary of the *EPS Report* and the *Draft Hausrath Report* provide the most up-to-date information about existing and future PDR and housing needs and conditions in the Eastern Neighborhoods rezoning study area. As such, these documents provide the basis for the City's expectation of cumulative land use change from reasonably foreseeable development in the Eastern Neighborhoods and its effect on the City's ability to meet its future PDR space needs while not adversely impacting its ability to meet its housing needs as expressed in the City's *General Plan.*

Cumulative Land Use Change in the Eastern Neighborhoods Rezoning Study Area

The analysis of cumulative physical land use change in the Eastern Neighborhoods DEIR was based on assumptions regarding the portions of the Eastern Neighborhoods area where the greatest change to existing zoning is expected to occur and upon the growth projections developed in the reports referenced previously in this EIR. The specific area and scope of anticipated land use change was determined by an examination of where new use districts and height and bulk rules could be expected to foster new development, particularly residential construction.

Using the above approach, the Eastern Neighborhoods DEIR identifies the areas most likely to undergo land use changes under the rezoning options and the No Project (existing zoning) alternative. New residential and mixed-use development is anticipated in much of East SoMa under all three rezoning options, including the areas surrounding the block containing South Park, which includes the project site. These blocks are identified as an area of potential land use change due to the replacement of the existing SLI zoning, which generally prohibits market-rate housing, to the Urban Mixed Use (UMU) zoning district as defined the in the Eastern Neighborhoods DEIR, where some mix of market-rate and BMR housing would be permitted. The rezoning option with the greatest potential for land use change would be Option C.[13] Until final controls are adopted for the new UMU District, it will be difficult to determine the degree of future land use change that would take place in this area, particularly if the new UMU zoning continues the restrictions on market-rate housing that already exist in the SLI District. However, for purposes of analysis, this EIR assumes that the project lies within an area that will be subject to substantial physical land use change.

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[12] *Draft Hausrath Report,* op cit.

[13] Pages 29-30, *Eastern Neighborhoods Rezoning and Area Plans Draft Environmental Impact Report.* June 30, 2007, Planning Department Case No. 2004.0160E.

The Eastern Neighborhoods DEIR concluded that, while the character of land uses and neighborhoods would change as a result of rezoning in the Eastern Neighborhoods, new residential development would be directed to areas most suitable for future residential development, and PDR would be encouraged in areas best suited for PDR uses. Therefore the cumulative physical land use change associated with such development would not be considered adverse and therefore would not have a significant effect under CEQA.[14] However, the Eastern Neighborhoods DEIR also concluded that rezoning in the Eastern Neighborhoods would result in reduction in the supply of land and buildings available for PDR use. Rezoning would result in a potential cumulative loss of between 524,618 square feet of PDR space (Option A) and 4,933,350 square feet of PDR space (Option C), with a potential for loss of 4,616,061 square feet of PDR space under the No Project (existing zoning) alternative. This potential loss of space available for PDR uses could result in displacement of PDR businesses and jobs , which would be a potentially adverse social and economic effect stemming from the physical land use changes that would be enabled by the rezoning. Therefore, the Eastern Neighborhoods DEIR concluded that the potential loss of PDR space that would result under both Option C and the No Project Alternative (but not under Options A and B) of the Eastern Neighborhoods rezoning as analyzed would be a potentially significant, unavoidable land use impact.[15]

SAN FRANCISCO'S HOUSING NEEDS

Another social and economic concern being considered in the Eastern Neighborhoods rezoning effort is a desire to address the City's housing needs as set forth in the *General Plan*. As required by state law, Part I (*Data and Needs Analysis*) of the City's *Housing Element*, (part of the City's *General Plan*), incorporates a set of six-year housing production goals ("housing need determinations") generated by the state Department of Housing and Community Development (HCD) in conjunction with the Association of Bay Area Governments (ABAG). ABAG is required by law to distribute the region's "fair share" of statewide housing need among the separate cities and counties of the nine-county Bay Area region.[16] San Francisco's "fair share" of the regional housing need for the period covering January 1999 through June 2006 (a 7.5 year

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[14] Ibid., p. 61.

[15] Ibid., p. 66-68.

[16] The numbers supplied by ABAG are "goal numbers" and often exceed anticipated growth in housing units cities and counties expect to actually produce in a given year. Every city and county in the nine-county ABAG region must plan for the level of growth assigned by this process, in the state-mandated update of their respective *General Plan Housing Elements*.

period) was 20,372 units, or 2,717 units per year. Sixty-four percent of the total production goal is targeted for moderate, low, and very low income-households as set forth in Table 2.[17]

TABLE 2
NEW CONSTRUCTION HOUSING NEED BY INCOME CATEGORY (JANUARY 1999 - JUNE 2006)

Household Income Groups	Affordability Criteria (household income as percent of Area Median Income)[a]	RHND[b] Housing Unit Allocation	Share
Very Low	50	5,244	25.7%
Low	80	2,126	10.4%
Moderate	120	5,639	27.7%
Above Moderate	> 120	7,363	36.1%
TOTAL		**20,372**	**100%**

Source: Housing allocation information from the San Francisco *General Plan, Housing Element,* Adopted May 19, 2004, Part 1, Section III, Table I-50, p. 79. Definitions of household income groups and affordability criteria are from San Francisco Planning Department, *Housing Inventory* 2005, p. 19, *http://www.sfgov.org/site/uploadedfiles/moh/Rent_Levels/MOH2006IncomeLimits(1).pdf,* accessed for this report on February 8, 2007.

Notes:

a. The United States Department of Housing and Urban Development (HUD) defines qualifying criteria for each income group by share of the Primary Statistical Area's (PMSA's) median income, family size, and whether the housing unit is rental or ownership. HUD updates the medium income annually. In 2005, the HUD Median Income for the San Francisco PMSA was $76,000 for a two-person household and $95,000 for a four-person household. Thus, a four-person household would be in the Low Household Income Group if their household income were more than $47,500 per year but less than or equal to $76,000 per year, that is, greater than 50 percent but less than or equal to 80 percent of the PMSA's median income.

b. Regional Housing Needs Determination. Housing unit production targets developed by the Association of Bay Area Governments, as required by State law (see Table I-50 and the related discussion on pp. 79 to 80, San Francisco Planning Department, *Housing Element,* Part I, Needs Assessment, adopted May 13, 2004.

Table 3, presents data on housing production performance (goals and actual production) for the periods 1989-1998 and 1999-2006. As described in Part I of the *Housing Element,* the City has chronically under-produced housing, satisfying 41 percent of its average annual housing production goals or "needs" for the 6.5-year January 1989 to June 1995 period with production over the 10-year 1989-1998 period. For the 7.5-year period of January 1999-June 2006, the City produced 65 percent or 13,107 units of its total housing production goal of 20,372 net new units by the end of the 7-year production period for which data is available through December 2005 (it produced 69 percent on an annual average basis). Of the total number of housing units

[17] The City does not prepare an independent estimate of long-range housing need, but the average annual need based on the current six-year ABAG housing needs determination goals can be used on an on-going basis as a rough approximation.

produced to date, the City achieved 27 percent (29 percent on an annual basis) or 3,475 units of its goal to produce 13,009 BMR units affordable to moderate, low- and very low-income households.[18]

Part I of the *Housing Element* states that there are "more than enough in-fill housing opportunity sites to meet the projected housing needs"[19] but that a chronic shortfall in annual capital subsidies prevents the City from meeting its BMR housing production goals. Specifically, the *Housing Element* estimates that capital subsidies would need to be increased over 300 percent to meet the City's annual BMR housing production targets.[20] While acknowledging that the annual housing production and affordability targets set by HCD and ABAG will be difficult to achieve, the *Housing Element* states that "setting the goals to be more 'realistic' and 'achievable' could only weaken efforts at seeking and obtaining resources necessary to meet the City's urgent housing needs."

Thus, absent increases in public financing for the production of BMR housing affordable to moderate, low- or very low-income households or significant changes in the underlying costs of producing housing in San Francisco, it is doubtful that cumulative residential development in the Eastern Neighborhoods rezoning study area between now and 2030 would meet the City's housing production goals or "needs" as defined in the *General Plan*.

While Part I of the *Housing Element* provides an analysis of housing data and needs, Part II of the City's *Housing Element* sets forth objectives, policies, and implementing programs to address the City's critical housing needs defined in Part I. In addition, the Department plans to address its housing production targets through initiatives such as the Citywide Action Plan (CAP), which will explores the challenge of meeting the need for both housing and jobs in ways that capitalize upon and enhance the best qualities of San Francisco as a place.[21] The CAP will direct a mix of housing and neighborhood-serving uses to places with good public transit and urban amenities, new office uses to the City's compact downtown core, and needed industrial uses to core industrial lands in portions of the City's east side, thereby releasing the rest for housing and other uses.

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[18] Although data for the first six months of housing production in 2006 is not in the production totals, it is unlikely that six-month production totals would equal the unmet need for the period.

[19] See page 121 and the Inventory of Land Suitable for Residential Development, Section IV, Part I of the *Housing Element*.

[20] See page 121 and the Inventory of Land Suitable for Residential Development, Section IV, Part I of the *Housing Element*.

[21] San Francisco Planning Department, *San Francisco General Plan, Housing Element*, May 13, 2004, Part II, pages 127-132 as well as the *1990 San Francisco Residence Element*. This report is available online for public review at: *http://www.sfgov.org/site/uploadedfiles/ planning/projects_reports/Adopt%20Preface.pdf*, accessed for this report on March 8, 2007.

The *Housing Element*'s objectives and policies supporting housing production to meet the City's overall need for housing and for affordable housing are as follows.

Objective 1 ***(Housing Supply)***: Provide New Housing, Especially Permanently Affordable Housing, in Appropriate Locations, Which Meets Identified Housing Needs and Takes into Account the Demand for Affordable Housing Created by Employment Demand.

Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing, and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households. Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood scale and character where there is neighborhoods support.

Policy 1.2 Encourage housing development, particularly affordable housing, in neighborhood commercial areas without displacing existing jobs, particularly blue-collar jobs or discouraging new employment opportunities.

Policy 1.3: Identify opportunities for housing and mixed-use districts near downtown and former industrial portions of the City.

Policy 1.4 Locate in-fill housing on appropriate sites in established residential neighborhoods.

Policy 1.5 Support development of affordable housing on surplus public lands.

Policy 1.6 Create incentives for the inclusion of housing, including permanently affordable housing, in new commercial development projects.

Policy 1.7 Encourage and support the construction of quality, new family housing.

Policy 1.8 Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households

Policy 1.9 Require new office developments and higher educational institutions to meet the housing demand they generate, particularly the need for affordable housing for lower income workers and students.

Objective 8 ***(Housing Access)***: Ensure equal access to housing opportunities.

Policy 8.1 Encourage sufficient and suitable rental housing opportunities and emphasize permanently affordable units wherever possible.

Policy 8.3 Ensure affirmative marketing of affordable housing.

Policy 8.4 Encourage greater economic integration within housing projects and throughout San Francisco.

Policy 8.6 Increase the availability of units suitable for users with supportive housing needs.

Policy 8.8 Eliminate discrimination against households with children.

Policy 8.9 Promote the adaptability and maximum accessibility of residential dwellings for disabled and elderly occupants.

Policy 8.10 Encourage the provision of new home ownership opportunities through new construction so that increased owner occupancy does not diminish the supply of rental housing.

Objective 11 ***(Housing Supply)***: In increasing the supply of housing, pursue place making and neighborhood building principles and practices to maintain San Francisco's desirable urban fabric and enhance livability in all neighborhoods.

Policy 11.1: Use new housing development as a means to enhance neighborhood vitality and diversity.

Policy 11.2: Ensure housing is provided with adequate public improvements, services, and amenities.

Policy 11.3: Encourage appropriate neighborhood-serving commercial activities in residential areas without causing affordable housing displacement.

Policy 11.5: Promote the construction of well-designed housing that enhances existing neighborhood character.

Policy 11.8: Strongly encourage housing project sponsors to take full advantage of allowable building densities in their housing developments while remaining consistent with neighborhood character.

Policy 11.9: Set allowable densities and parking standards in residential areas at levels that promote the City's overall housing objectives while respecting neighborhood character and scale.

Policy 11.10 Include energy-efficient features in new residential development and encourage weatherization in existing housing to reduce overall housing costs and the long-range cost of maintenance.

One implementing program of the *Housing Element*, the Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 315 to 315.9), is the City's primary mechanism for producing BMR housing without the use of public subsidies in for-profit residential development. The City's Residential Inclusionary Affordable Housing Program was amended in August 2006 to increase the percentage of Inclusionary BMR affordable housing required in new market-rate projects. However, the higher percentages (15 percent for on-site and 20 percent for off-site) only apply to housing projects where the first application, including an environmental evaluation application or any other Planning Department or Building Department application, were submitted on or after July 18, 2006. Accordingly, the original 12 percent requirement would apply to the proposed project because the project would require CU authorization. Thus, consistent with the Inclusionary Program, the Project would provide approximately 10 BMR for-sale units affordable to moderate income households (earning 100 percent San Francisco AMI.

In addition to providing 10 new Inclusionary BMR units, the project's contribution to the supply of market-rate housing could moderate or reduce market-rate housing price increases relative to increases in household income, thereby addressing further deterioration of overall housing affordability in San Francisco.[22]

[22] Sedway Group, for the City of San Francisco, *Implications of Changes to San Francisco's Inclusionary Housing Program*, December 20, 2001, page 5.

IMPACTS

SIGNIFICANCE CRITERIA

A project would have a significant effect on the environment in terms of Land Use if it were to:

- Disrupt or divide the physical arrangement of an established community, or
- Have a substantial adverse impact on the existing character of the vicinity; or
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the *General Plan*, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

The Initial Study (see Appendix A) determined that the proposed project would have a less than significant effect on a project level for the Land Use criteria above. Specifically, because the Project involves the preservation and adaptive re-use of an existing historic building currently used as a surface valet parking garage in the center of a mixed-use neighborhood, it would not directly disrupt or divide the physical arrangement of an established community or have a direct substantial adverse impact on the existing character of the vicinity. As discussed above, the proposed project would also conform to both the current SoMa Base District zoning and the draft zoning set forth in the September 6, 2007, *Draft East SoMa Area Plan*, so it would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the *General Plan*, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Although the proposed project's direct land use impacts would be less than significant, its contribution to cumulative land use impacts, when combined with other reasonably foreseeable development in the Eastern Neighborhoods rezoning study area, may be significant. Thus, this EIR assesses the proposed project's contribution to cumulatively significant land use effects within the Eastern Neighborhoods rezoning study area by assessing the proposed project's cumulative effects on the City's ability to meet its (1) future PDR space needs, and (2) housing needs as expressed in the City's *General Plan*.

As discussed in the Initial Study, the social and economic changes resulting from a project should not be treated as significant effects on the environment under CEQA unless they involve substantial physical impacts. However, the social and economic effects of a substantial physical change may be used to determine if it is adverse (CEQA Guidelines Section 15064(e)). Thus, if the physical change caused by a project were substantial, and the social and economic effects caused by the substantial cumulative physical change were adverse, then the physical change

could be a significant effect under CEQA. Therefore, the replacement of formerly industrial uses with residential or mixed-use development, a process that could be accelerated by rezoning in the Eastern Neighborhoods, could result in a potentially substantial cumulative physical change in land use character. The Eastern Neighborhoods DEIR also noted that there would be a loss of PDR space and an associated decrease in PDR jobs under the No Project (existing zoning) alternative.

CUMULATIVE IMPACTS ANALYSIS

Substantial Land Use Changes in the Eastern Neighborhoods Rezoning Study Area

As discussed in the Setting section, the Eastern Neighborhoods DEIR analyzes cumulative physical land use change by identifying where changes in existing use and height and bulk districts could be expected to foster new development, particularly new residential construction. Specifically, the Eastern Neighborhoods DEIR states that new mixed-use residential development can reasonably be anticipated in those areas where the zoning would change to encourage mixed-use residential development where such development is currently difficult to approve, discouraged, or in some cases, prohibited. As noted on p. III-A.8, the Eastern Neighborhoods DEIR identifies the areas south of South Park as potential locations for substantial land use changes under the rezoning, based on the assumption that the existing restrictions on the development of market-rate housing under SLI zoning would be removed.

Future PDR Space Needs in the Eastern Neighborhoods Rezoning Area

As discussed in detail in the Setting section, the project site is currently zoned SLI, a designation that currently permits a range of PDR uses and non-PDR uses, including affordable BMR housing and market-rate housing in Contributory Buildings subject to a CU authorization. All three zoning options (A, B, and C) in the *Eastern Neighborhoods Workbook* designated the project site for some form of mixed-use residential zoning, with Option B designating the site for rezoning to Residential/Commercial uses.[23] Accordingly, both the *EPS Report* and the *Draft Hausrath Report* analyze future PDR space supply based on a mixed use residential designation for the project site.

Although the project site has not been occupied by a PDR business since 2000 (when it served as an automotive repair shop), because it is a former warehouse located in the SLI District it could

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[23] *Eastern Neighborhoods Workbook*, pages 92-94, maps of Options A, B & C (Go to the Planning Department's home page (*http://www.sfgov.org/planning*) scroll down the center column entitled "*Community Planning in the Eastern Neighborhoods Rezoning Options Workbook Draft*." This report is available online for public review at: *http://www.sfgov.org/site/uploadedfiles/planning/community planning/pdf/cp_dworkbook_all5.pdf*.

theoretically be reoccupied by a PDR use, exclusively or mixed with other compatible uses. Therefore, based on the assumptions used in the *EPS Report* and for purposes of the EIR, former warehouse-style buildings with SLI zoning would be considered part of City's existing potential PDR land inventory that would be affected by cumulative development in the Eastern Neighborhoods rezoning area; using an assumption of 0.62 FAR, the project site could accommodate 13,640 sf of PDR space under Option B.[24] As noted on p. III.A-9, the Eastern Neighborhoods DEIR concluded that all of the rezoning options studied in the DEIR, as well as the "No Project" alternative, would lead to a cumulative loss of PDR space, and that the potential loss of PDR space that would occur under Option C and the "No Project" alternative would be a significant unavoidable impact.

The proposed project would redevelop the project site into a residential use with a small amount of potential ground floor retail. As a result, the proposed project would preclude a future PDR use of the site, thereby incrementally reducing the supply of land suitable for PDR development in Eastern Neighborhoods rezoning study area to meet projected demand for PDR space. The project site's 22,000 sf of land area represents 0.09 percent of the *EPS Report's* projected demand for 23.8 million sf of PDR-only land in the Eastern Neighborhoods study area by 2030. It is unclear whether the substantial physical land use changes generated by the final Eastern Neighborhoods rezoning would result in a cumulative net deficit of PDR space, contributing in turn to displacement of PDR businesses and jobs greater than what would be expected under current zoning. This uncertainty is due to the fact that both the Eastern Neighborhoods and Western SoMa planning efforts are ongoing processes, with final Eastern Neighborhoods rezoning and community plans not anticipated to be adopted until 2008. In addition, the conservative assumptions in the *EPS Report* and the availability of industrially-zoned land for PDR space in Hunters Point and Port lands also means that the projected future PDR space deficit may be overstated. Finally, the *Draft Hausrath Report* concludes that "over the long-term, the rezoning proposal (i.e., Option B) offers the possibility of more location advantages for PDR activity in San Francisco and therefore more PDR business activity and jobs than would otherwise be the case if there were no rezoning."[25]

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[24] Under the Option A scenario, there could be approximately 13 percent more PDR space available than Option B. Under Option C, there could be approximately 22 percent less PDR space available than under Option B. As discussed earlier in this EIR, the *Eastern Neighborhoods Workbook* provides a general sense of the range of difference between the three rezoning options (A, B, and C). These percentages were calculated from the estimates of "Created Capacity" for PDR space for the three zoning options, using the figures provided in *Eastern Neighborhoods Workbook*, page 91, Table: Zoning Options Assessment, Eastern Neighborhoods.

[25] *Draft Hausrath Report*, page 38.

Given this uncertainty and pending the final outcome of the Eastern Neighborhoods rezoning process, this EIR assumes a "worst case" (for the purposes of CEQA) scenario where there is both strong PDR job growth and demand for PDR space, where space suitable for PDR development in Hunters Point, Port property, and the Western SoMa is unavailable and where a more housing intensive rezoning option than Option B is approved. Under this worst case scenario, the proposed project would contribute to a greater deficit in PDR space than would otherwise occur without the project, thereby contributing to greater displacement of PDR businesses and jobs than would otherwise occur under existing zoning. For purposes of this EIR, this loss of opportunity for PDR use on the project site and the potential associated displacement of PDR businesses and jobs would be considered a significant, unavoidable cumulative effect of the proposed project, which, by definition, would develop the project site in a manner that would preclude the possibility of PDR use in the future.

No mitigation has been identified for the proposed project's contribution to the cumulative loss of land available for PDR use in the Eastern Neighborhoods rezoning study area. Alternatives to the proposed project are discussed in Chapter VI of this DEIR. Implementation of Alternative B: Mixed-Use PDR or Alternative C: PDR-Only, as well as the No Project alternative, would avoid the potential for the proposed project to contribute to the cumulatively significant effect.

San Francisco's Housing Needs

The proposed project would contribute toward meeting the City's housing needs as set forth in the *General Plan* in the following ways:

- Produce up to 85 new residential units or three percent of the *Housing Element*'s total annual housing production target of 2,852 units.
- Produce 10 on-site inclusionary for-sale BMR units reserved for moderate-income households not earning more than 100 percent of the Area Median Income. These 10 new for-sale BMR units would contribute toward satisfying one percent of the City's annual 752-unit "Moderate Income" housing production target set forth in Part I of the City's *Housing Element*.
- Produce a high-density, transit-oriented housing development in an under-utilized industrially zoned site located near major transit lines in a location designated as desirable for such development in both Part II of the *Housing Element*, the Commission's *Interim Policies and Procedures for the Eastern Neighborhoods*, and in the draft SoMa Area Plan.

For the above reasons, the proposed project would not adversely affect the City's ability to meet its housing needs as defined in the *General Plan*.

As described in greater detail in the Setting section, San Francisco has repeatedly failed to meet its annual housing production goals. For the January 1999 – June 2006 period, the City satisfied only 65 percent of its annual housing production goals or "needs", and only 27 percent of its cumulative goal to produce 13,009 BMR units affordable to moderate, low- and very low-income households.[26] One major obstacle to meeting the City's BMR production targets is adequate public funding—the *Housing Element* estimates that annual public subsidies would need to be increased over 300 percent to satisfy its BMR production goals.[27] In the meantime, the growth in the median price of market-rate housing continues to outpace the growth in median household income, further reducing the percentage share of San Francisco residents who can afford to purchase or rent a market-rate home in San Francisco. Increasing market-rate housing supply in the Eastern Neighborhoods is one of several policy responses to the issue of housing affordability. Assuming that the rate of employment and household income growth remain constant, increasing market-rate housing supply could, over time, improve the overall affordability of the housing market.[28]

Despite the benefits of substantially increasing housing production, there are concerns that increasing market-rate housing production could, in some circumstances, adversely affect housing affordability on a neighborhood level. Specifically, some housing advocates question whether substantial increases in market-rate housing production in neighborhoods with large concentrations of lower-income residents would lead to displacement of lower-income tenants and the permanent loss of housing once affordable to lower-income tenants.

The term "affordable" frequently is used to refer to both "permanently affordable" BMR housing (i.e., publicly subsidized and/or deed-restricted housing that is only available to households with specific qualifying incomes—see Table 2) and "market-rate" rental housing that is currently affordable to moderate or lower income renters due to a combination of rent control and local market conditions. While the loss of permanently affordable BMR housing is highly unlikely because of strict legal protections prohibiting demolition and conversion of BMR units, the stock of conventional market-rate rental housing is inherently more vulnerable to price changes caused by market demand. Among other factors, the introduction of substantial amounts of new market-rate housing in areas that have seen little such investment could influence public perception, leading to even greater market demand for existing rental units in the same area, contributing, in turn, to rising rents, increased eviction rates to permit

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[26] Although data for the first six months of housing production in 2006 is not in the production totals, it is unlikely that six-month production totals would equal the unmet need for the period.

[27] *Housing Element,* Part I, page 121.

[28] *Draft Hausrath Report,* page 35.

conversions of existing rental stock to ownership housing, or in limited cases, demolition of existing, non-BMR rental stock to build new housing.

The *Draft Hausrath Report* notes that increased market-rate housing supply would create more BMR housing as a result of the recently amended Inclusionary Affordable Housing Program requirements to housing projects of five or more units. In addition, the *Draft Hausrath Report* concludes that, "With the proposed rezoning, there would be more housing supply potential to meet demand across a number of market segments. Generally, housing prices and rents for both new and existing housing, including vacated rental units, would be lower than would be the case with the more limited housing supply potential in these areas under existing zoning and continuation of existing market trends. Under the proposed rezoning, there would be less demand pressure to convert existing rental housing stock to relatively affordable for-sale housing. Under these less constrained market conditions, there also would be more housing options for newcomers. Furthermore, current residents who have to find new housing would have more options for remaining in these areas of San Francisco than they would without the additional supply of both market-rate and affordable units."[29] Ultimately, the *Draft Hausrath Report* concludes that, "the proposed rezoning would result in less displacement than otherwise expected in the face of continued demand for housing in San Francisco."[30]

In addition, over the past several decades, San Francisco has implemented a series of local ordinances and policies designed to preserve the affordability of existing non-BMR rental housing and prevent its loss. These policies include the City's rent control and "just cause" eviction ordinances which provide relatively strong protections for existing tenants and, in rent-controlled units, prohibit significant rent increases except when an existing tenant vacates. Second, the City has established annual limits on the number of rental units in structures containing three to six units that may be converted to condominium ownership. Condominium conversions of rental apartments containing more than seven units are prohibited. Finally, through a combination of Planning Code and Planning Commission policies, the City actively discourages the merger and/or demolition of existing housing stock, regardless of whether it is

[29] *Draft Hausrath Report*, page 35.

[30] *Draft Hausrath Report*, page 35.

rental or ownership.[31] These policies would continue to apply in the Eastern Neighborhoods planning areas, regardless of whether a substantial amount of new housing is built. For all of the above reasons, it is highly speculative to assume that a substantial increase in the supply of new market-rate housing in the Eastern Neighborhoods rezoning area would exacerbate the loss of affordable housing, especially in the East SoMa area, where a substantial portion of government-subsidized, permanently affordable housing is located.

As discussed above, the proposed project would contribute to fulfilling the City's annual housing production targets. However, a variety of economic and financial issues unrelated to the proposed project or future cumulative residential development in the Eastern Neighborhoods rezoning area would likely prevent the City from meeting its annual BMR housing production targets. For the above reasons, the proposed project would not adversely affect the City's ability to meet its housing needs as defined in the *General Plan*.

[31] The Commission recently adopted Resolution 16700 which enacted a policy requiring mandatory discretionary review of residential demolition applications not subject to Conditional Use. Under the Temporary Residential Demolition Policy, permit applications to demolish any residential structure, unless Conditional Use authorization is required for demolition approval, are subject to mandatory Discretionary Review (DR) hearings, with the following exceptions: structures determined to be public hazards or structures damaged beyond feasible repair by fire, earthquake, or other act of God to be demolished and replaced in kind, and recommended for demolition by the Director of the Department of Building Inspection are exempt from mandatory Discretionary Review under this policy.

B. HISTORIC ARCHITECTURAL RESOURCES

INTRODUCTION

This section of the EIR assesses potential effects of the proposed project on historic architectural resources. The section briefly describes the cultural setting and context of the project area and the history of the project site. Applicable state, federal, and local regulations are identified, followed by impact analysis and mitigation measures, where available and required, to reduce adverse impacts on historic resources. The Initial Study determined that potential impacts related to archeological and paleontological resources, the other topic areas included under the cultural resources section in the Initial Study checklist, would be less than significant. Therefore, this EIR section only analyzes potential impacts to historic architectural resources. The Initial Study is included as Appendix A of this EIR.

The setting discussion in this section of the EIR is based primarily on the Historic Resources Evaluation (HRE) prepared by Wendy M. Hills and Page & Turnbull,[32] while the impact analysis is based on the Planning Department's Historic Resources Evaluation Response (HRER).[33] The HRE includes a description of the building and its surroundings, a building history, the context of the historic significance, and a discussion of the impacts the proposed project would have on the building's historic significance. The HRER confirms that the 178 Townsend building (also known as Station B) is a historic resource, provides an evaluation of the building's historic integrity, provides a determination that project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and determines the proposed project's impacts on the historic resource.

SETTING

The project site is an urban lot in the City of San Francisco and includes the former California Electric Light Company Station B building (Station B). The building has changed uses and owners many times over the years; however, for clarity in this EIR, the building will be referred to by its historic name throughout this document as the California Electric Light Company Station B or Station B. Station B has been determined to be a historical resource for the purposes of CEQA under Section 15064.5 of the CEQA Guidelines.

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[32] Wendy M. Hills and Page and Turnbull, *178 Townsend, San Francisco, California Historic Resource Report, August, 2007.* This report is available for public review by appointment at the Planning Department, 1650 Mission Street, 4th Floor, Project 2005.0470E.

[33] City and County of San Francisco Planning Department Memorandum, *Historic Resources Evaluation Response*, September 17, 2007. This memorandum is available for public review by appointment at the Planning Department, 1650 Mission Street, 4th Floor, Project 2005.0470E.

HISTORIC SETTING

Historic District/Neighborhood Context

Station B is located in the South End Historic District. The following summarizes the District's history and significance.

The South End Area of San Francisco is generally bounded by King Street, Third Street, Brannan Street, and First Street. The South End Historic District boundaries are shown in Figure 17. Prior to the 1906 earthquake, San Francisco's South End was characterized by varied land uses. Although industry was dominant, there were also clusters of wood-frame workingmen's cottages and tenements housing longshoremen and warehouse workers. With the exception of the piers along the seawall (which was located along what is now the Embarcadero) and a handful of industrial buildings and warehouses on Townsend and King Streets, including Station B, the South End warehouse district was leveled as a result of the 1906 earthquake. Due to concerns over safety and efficiency, the South End was reconstructed after 1906 as a predominantly industrial area. Discarding the timber-framing technology of the nineteenth century, many new warehouses and industrial buildings were built with steel, brick, or concrete. In addition to providing superior fire resistance and structural stability, the new technologies allowed for the construction of much larger multi-story buildings with clear-span interior spaces. Improving elevator technology and higher land costs also fed into the trend of constructing multi-story buildings. However, post-quake reconstruction of the California Electric Light Company's Station B did not follow these trends. Constructed in 1888 as an early steel-frame industrial building, its new owners reconstructed the front part of the building with a timber frame as part of its conversion into a hay warehouse and feed mill in 1908.

The 1914 opening of the Panama Canal, which cut the distance from Europe to San Francisco by over 5,000 miles, contributed greatly to the economic vitality of the South End. Several large concrete warehouses were constructed in the South End in anticipation of the Panama Canal, and several others were completed not long after. The decade between 1919 and 1929 was an era of industrial construction in the South End. Fueled by general prosperity, San Francisco's entrepreneurs constructed even larger concrete frame warehouses and industrial buildings.

By the end of the 1920s, San Francisco's port began to experience increased competition from Los Angeles, Long Beach, Portland, Tacoma, and Seattle. As late as 1929, however, San Francisco could still handle almost half of California's wholesale trade. Nevertheless, after the Stock Market Crash of October 29, 1929, pier and warehouse construction came to a virtual standstill that continued through the first half of the Depression.

SOURCE: City of San Francisco.

FIGURE 17: BOUNDARIES OF THE SOUTH END HISTORIC DISTRICT (IDENTIFIED AS "J")

Economic difficulties, oppressive management practices, and the desire of the employers' Industrial Association (IA) to destroy the newly emergent International Longshoremen's Association (ILA), led to San Francisco's most famous maritime strike, which started on May 9, 1934. The 1934 Waterfront Strike remains one of the most important events in the history of San Francisco and the American Labor Movement. On July 3, 1934 Townsend Street became the principal stage for several major skirmishes that occurred between striking longshoremen and the police. Station B appears to have sustained some damage during the events of July 1934; the building's tenant filed for permits in 1935 to replace doors and windows on the façade.

The Depression gradually came to a close with World War II. Prosperity during the war and the immediate postwar era temporarily restored vitality to the South End. In response, entrepreneurs built a handful of Modern style warehouses and factories in the area. Nevertheless, the Port of San Francisco and associated industries were steadily losing ground to the more modern ports of Los Angeles/Long Beach, Seattle/Tacoma and Oakland during the 1950s and early 1960s. The introduction of the forklift and long-distance trucking made multi-story warehouses increasingly obsolete. Also instrumental was the introduction of containerized shipping in the 1960s. The new system consisted of large cranes that transferred pre-packed metal containers between specialized ships and trucks or trains. Much more efficient than the old labor-intensive break-bulk system, containerized shipping operations needed large tracts of land within close proximity to deep water and railheads. With the exception of the Southern Waterfront, these conditions were no longer available in San Francisco's older waterfront districts. San Francisco tried to stop the exodus of shipping companies by building specialized container facilities at Piers 80 and 90, but by the 1970s, the industry was largely gone.

Most of the warehouses and factories of the South End did not remain vacant for long, as light industries, auto-repair facilities, and trucking operations began renting space in the large and easily adaptable buildings. By the mid-1990s the growth in technology industries led to the need for large volumes of space for both office and living. This need, coupled with legislation allowing "live-work" housing in former industrial buildings, led to the widespread conversion of warehouse buildings into dot-com office space and housing.

The South End Historic District's period of historical significance – 1867 to 1935 – comprises the era during which the waterfront became a vital part of the city and nation's maritime commerce. The buildings of the South End represent a rich and varied cross-section of the work of prominent local architects and builders of the period. Four buildings remain from the nineteenth century; another four were constructed in the six-year interval preceding the 1906

earthquake. The majority of the buildings were erected between 1906 and 1929, a period during which trade along the waterfront increased dramatically. The large numbers of intact masonry warehouses which remain to this day are reminders of the maritime and rail activities which helped to make San Francisco a great turn-of-the-century port city.

Design Context

Station B was designed in a utilitarian style of construction popular during the last quarter of the nineteenth century. Nineteenth-century Commercial Style (Commercial Style) industrial buildings can be identified by the following characteristics: square or rectangular floor plans, box-like massing with flat or gable roofs and high flat or stepped parapets, load-bearing brick walls laid up in five-course American Bond, simple corbelled detailing, recessed door and window openings capped by jack or segmental arches, heavy timber framing and freight elevators. Commercial Style warehouses and industrial buildings were also distinguished by their "fireproof" or fire resistant technologies including "slow-burning" timber framing, cast iron fire shutters and doors, and the incorporation of as little combustible wood trim as possible. The Commercial Style remained the most popular style for industrial buildings in the United States throughout the nineteenth and early twentieth century, until the development of reinforced-concrete construction in the first decade of the twentieth century.

Commercial Style warehouses and industrial buildings built in San Francisco usually consisted of two major interior spaces: the work floor and the office mezzanine, symbolizing the hierarchy implicit in the division of labor between manual and office workers. The work floor was usually a double-height space that occupied the bulk of the building's footprint; this is where the physical work of manufacturing, processing, packaging, storing, or moving goods took place. Few partitions were needed because they occupied valuable storage space and blocked circulation and natural light sources. The office mezzanine was usually located at one end of the building and consisted of two levels. The lower level was typically devoted to spaces used by the production workers, including break rooms, first aid stations, tool rooms and in some cases, an integral rail spur. The upper level was the location of the management functions, safes and vaults, clerical staff, and executive offices. Typically located at a good vantage point above the warehouse floor, the mezzanine allowed management to efficiently monitor activities on the work floor. Although some Commercial Style industrial buildings continued to be erected in San Francisco after the 1906 earthquake, the popularity of steel-frame and concrete warehouses surged in response to their much higher survival rate in the disaster. By the 1920s, concrete had supplanted load-bearing masonry as the preferred mode of construction.

During the first two decades of the twentieth century, PG&E – the successor firm to the California Electric Light Company – commissioned architects to design power plants and substations that reflected the principles of the City Beautiful Movement. The overall goal of the City Beautiful Movement was to bring order to the often chaotic situation of urban America through uniformity and beauty in architecture.

An article in the November 1915 issue of The Architect and Engineer entitled "Some Sub-Stations of the Pacific Gas & Electric Company" described the overall philosophy behind the design of electricity generating facilities:

> [The electrical substation] has developed as a windowless building, as it has been found that a windowless building gives the maximum economy in arrangement, that it provides unbroken wall surfaces which are needed for attaching various parts of the installation, and makes possible the insulation against the noise of the station operation disturbing the neighborhood in which it may be located. As all power leads are brought in underground, windows are not required for this purpose. Nor are they needed for light and ventilation since the interior is flooded with light to best advantage from skylights in the ceiling, and ventilation is best accomplished through air ducts with openings in the floor and louvers in the roof...The individuality of each station is expressed architecturally in the detail of its composition and ornaments.

The design of the California Electric Light Company's Station B was an early predecessor of the PG&E-perfected substation type described in the article.

The Architects – Percy & Hamilton

Station B is a work of one of nineteenth-century San Francisco's leading architectural firms, Percy & Hamilton. Consisting of partners Frederick F. Hamilton and George W. Percy, the firm was established in 1880 in San Francisco. Frederick F. Hamilton was born in Addison, Maine in 1851. In 1888, the architectural firm of Percy & Hamilton was commissioned by the California Electric Light Company to construct Station B, the company's second plant in the city.

Some of the architects' most notable projects include Greystone Cellars in St. Helena (1886-1889); the Sharon Building in Golden Gate Park in San Francisco (1887); the First Unitarian Church, at Franklin and Geary in San Francisco (1887); the old Academy of Sciences Building, on Market Street in San Francisco (1889); the Seventh Day Adventist Church, at California and Broderick in San Francisco (1892); the Kohl Building on Kearny Street, in San Francisco (1901); and several prominent homes in the Pacific Heights district of San Francisco. The firm also

designed several buildings in Stockton and a number of industrial buildings throughout Northern California, including Sperry's and Crown flour mills in Stockton and the Union Iron Works Administration Building in San Francisco (1894). Percy & Hamilton designed all of the California Electric Light Company's office buildings and electric light generating plants including the company's earliest building – Station A, on Stevenson Street – as well as Station B and the later Station C, on Jessie Street. Neither Station A nor Station C exists today.

BUILDING HISTORY

Station B was built as an electricity-generating plant by the California Electric Light Company in 1888. California Electric Light Company, the first in the world to operate and distribute light from a central station, began operating in 1879 from its combined headquarters and plant at 227-29 Stevenson Street (Station A). After several years of operation, the California Electric Light Company decided to construct Station B on the corner of Townsend Street and Clarence Place[34], a larger plant that would take advantage of the waters of Mission Bay to power the plant's steam boilers The original three-story brick building was designed to house dynamos used to generate electricity for electric light service. The front portion of Station B originally housed an office and engine room on the first floor, dynamos on the second floor, and storage on the third floor; the smokestack and boilers were in the rear portion of the building. Station B was briefly distinguished as having the tallest smokestack in the West, rising to 150 feet. By 1888, California Electric Light Company was providing most of the city's electric lights.

Station B changed ownership twice during the late nineteenth century. By 1894, Station B appeared in Hardy's San Francisco Block Book under the ownership of Edison Light & Power Company (EL&P); EL&P likely took control of the building in 1891 when the company purchased the California Electric Light Company. In 1894 EL&P merged with the San Francisco Gas Light Company to form the San Francisco Gas & Electric Company (SFG&E). A new plant was built across Townsend Street between 1903 and 1905, following the SFG&E acquisition; it is unclear whether Station B was closed at this time or if a portion of the plant remained in operation.

The 1906 San Francisco Earthquake caused a partial collapse of the engine room in the front of the building. However, the rear portion of the building survived the earthquake intact, and the 150 foot smokestack was not damaged. In spite of the damage, the fact that the building survived the event was remarkable, as Station B was located just south of fires that devastated downtown San Francisco.

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[34] The California Architect and Building News. September 15, 1888.

Following the earthquake, several alterations were made to the building. Around 1908, the heavily damaged second and third floors were removed and the front portion of the building, the former engine room, was capped off by a stepped gable parapet. The roof over the front (south) portion of the building was replaced with wood framing over galvanized iron. The roof over the less heavily damaged rear (north) portion of the building was simply repaired. An office was added to the southeast corner of the building, and twelve horse stalls were installed in the northwest corner of the front portion of the building. At some point between 1899 and 1908 Station B was reconstructed as a single-story high-bay space with lightweight steel trusses. At that time, the height of the building was raised 9 feet 6 inches, although the original trusses may have been reused.

The building underwent various changes in use during the twentieth century. Between 1908 and 1927, Station B was used as a feed mill. In 1915, Producers Hay Company cut one 3-foot by 9-foot window and a one 3-foot by 9-foot door into the brick to provide additional light and air to the office space within. Station B was vacant from 1928 through the early years of the Depression. Between 1935 and 1943, the Charles J. Worth Drayage Company used Station B as a general purpose warehouse and drayage[35] facility. Worth changed the office entrance from a single to a double door with a transom and converted the office's side door into a steel sash window in 1934. In 1944, an unnamed construction company submitted a permit application to renovate the office space inside the former engine room. In 1955, the San Francisco Warehouse Company purchased the building and applied for a permit to widen the main vehicular entrance on Townsend Street from 12 feet to 14 feet; a steel lintel was also added for support. Station B remained in use as a warehouse until 1967. Following a two-year vacancy, industrial ship repairers West Winds Inc. moved into the space. The rear (north) portion of the building was occupied by West Winds automotive repair. According to Sanborn maps and building permits, West Winds Inc. remained at this address through at least 1995.

In 1989, the building endured a second major earthquake, Loma Prieta. While minimal damage was sustained during this earthquake, it motivated the building owner to make seismic repairs. In 1993, the building owner submitted a permit application for bracing the parapet and removing most of the historic 150-foot-tall octagonal, battered brick smokestack at the rear of the building. The smoke stack is original to the building's 1888 construction. The permit for the parapet bracing was approved but the removal of the smokestack was denied. Nevertheless, in 1995, the majority of the smokestack was demolished. The building is currently used as a parking garage.

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[35] Drayage is an older term for hauling and transporting goods, typically a short distance.

Interior/Structural Alterations

The 1899 Sanborn fire insurance map indicates that, prior to 1906, Station B featured a steel frame in both the flat-roofed engine room (front volume) and gable-roofed boiler room (rear volume). In 1908, its new owners retained the original steel framing system in the less heavily damaged boiler room. The more heavily damaged former engine room was reconstructed with a traditional "slow-burning" heavy timber frame (see Figure 18). Remaining partially intact today, the timber framing consists of large posts that support lateral and transverse beams. The transverse beams are augmented by diagonal braces bolted into "bird's mouth" notches on the sides of the posts. This largely freestanding post and beam system, in turn, supports a network of relatively insubstantial wood trusses. The trusses, which support the lightweight corrugated steel roof, spring from a narrow shelf near the top of the brick perimeter walls. The two bays closest to Townsend Street feature intact fan trusses dated back to the 1908 renovations, whereas the other trusses in the former engine room (mostly king post trusses) have been extensively modified for contemporary lighting, plumbing, and mechanical equipment. Many of the king posts have been removed from the trusses to provide additional space for mechanical equipment.

Over time, the framing system within the former engine room has undergone many modifications, compromising its historical integrity, if not its long-term structural stability. First, at least four of the original posts have been completely removed from the fourth and sixth bays in from Townsend Street. A portion of a fifth post has been removed from the first bay. Finally, a sixth post was replaced with a steel column in the third bay. In the case of each column removal, the beam and truss system was modified to redirect the vertical load to the ground. These modifications include the installation of additional diagonal braces and cables to reinforce the lateral and transverse beams.

BUILDING DESCRIPTION

The following section provides a physical description of the building as it appears today.

Station B is located on a rectangular, 22,000 square-foot parcel with frontages on Townsend Street (to the south) and Clarence Place (to the west). Constructed in 1888, this industrial building is comprised of two spaces: a front volume facing Townsend Street to the south and a

A. South façade along Townsend Street.

B. West façade along Clarence Place.

C. Rear volume of west façade along Clarence Place.

D. North and east façades.

SOURCE: Page & Turnbull

178 TOWNSEND STREET PROJECT

FIGURE 18: EXISTING EXTERIORS

separate rear volume to the north. The entire building has a long, rectangular footprint. The two volumes are separated by a shared 18-inch-thick brick gable demising wall with a central, arched opening. The demising wall rises to 51 feet at its highest point.

South Elevation (Townsend Street)

A corbelled cornice and a stepped parapet unify the main façade (south elevation) (see Figure 18, Photo A), which rises from 23 feet 7 inches at the side pilasters to 35 feet 7 inches at the tallest point of the stepped parapet. The openings on the south elevation are arranged within three bays that are defined by four rectangular pilasters. The brick is laid in a running bond pattern below the cornice and a common bond from the cornice to the parapet. The difference between the brick bonds, type of brick (face brick below), and mortar suggests that the portion below the corbelled belt course is original and the part above was reconstructed in 1908. The left (west) bay features an entrance to the office. This opening features a segmental arch with a large wood-frame transom and two sidelights framing a non-historic hollow metal door; it is accessed by two concrete steps. The central bay features a semi-circular arched vehicular entry and is fitted with a non-historic metal rolling door. A small, fixed, steel-sash window with two lites is located above the cornice line; a vent is attached to the bottom of the window. The right (east) bay features a tall, rectangular opening infilled with two one-by-one aluminum replacement windows over two two-by-two steel casement windows; the upper and lower sash are separated by recessed spandrel panels made of 3-inch-wide vertical wood siding. The infill in this opening is not original to the building.

West Elevation (Clarence Place)

The west elevation consists of two visually disparate sections; one to the south and one to the north of the central brick demising wall (see Figure 18, Photos B and C).

The southern section corresponds to the former engine room described above and is composed of eight bays delineated by rectangular brick pilasters. The brick is laid in a common bond pattern and rises to 19 feet 6 inches with a subtle projecting cornice of two courses of brick. The bay furthest north is approximately 12 feet taller than the other bays and is capped with a stepped brick cornice that more closely matches the northern section of the building. The original design of this elevation appears to have included one segmentally arched window opening in each bay. Many undated changes have occurred over the years.

The northern section of the building corresponds to the interior boiler room described above (see Figure 18, Photo D). This section consists of a wall that rises to 33 feet 9 inches at the eaves and features a corbelled brick cornice at the top, an intermediate cornice with corbelled

supports and a 4-foot 5-inch-tall water table, now sheathed in concrete. This west elevation of this portion of the building retains six identical original windows set high beneath the intermediate cornice; all window openings are segmentally arched and have brick sills. Of the six windows, three 2 inch by 2 inch wood divided lite casement windows are intact while the other three openings have been filled with plywood. An original segmentally-arched vehicular entrance, now filled with brick, is located at the far north end of this bay. Two larger vehicular openings occur near the midpoint of the wall and are both fitted with non-historic metal overhead doors. The faded painted words "Continental House Bonded Warehouse," a later use, can be seen on a brick panel above the vehicular door to the south.

North and East Elevations

The northeast corner is all that remains visible of the north and east elevations, as adjacent buildings abut both elevations (see Figure 18, photo D). Four window openings at the interior of the east wall have been filled in. An entrance on the northernmost side of the east elevation has been filled in with brick.

REGULATORY SETTING

FEDERAL REGULATIONS

National Register of Historic Places. The National Register of Historic Places (NRHP) is the nation's master inventory of known historic resources. The NRHP is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the national level.

Structures, sites, buildings, districts and objects over 50 years of age can be listed on the NRHP as significant historic resources. However, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included on the NRHP. The criteria for listing on the NRHP include resources that:

- are associated with events that have made a significant contribution to the broad patterns of history,
- are associated with the lives of persons significant in our past,
- embody the distinctive characteristics of a type, period, or method of construction, or that represent the work or a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction, or
- have yielded or may likely yield information important in prehistory or history.

Listing of a property on the NRHP does not prohibit demolition or alteration of that property, but does denote that the property is a resource worthy of recognition and protection.

STATE REGULATIONS

California Environmental Quality Act

California Environmental Quality Act (CEQA) Section 21084.1 states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." These changes include physical demolition, destruction, relocation or alteration of the resource or its immediate surroundings. For the purposes of Section 15064.5, the term "historic resources" shall include the following:

- A resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources.
- A resource included in a local register of historic resources (such as Articles 10 and 11 of the *San Francisco Planning Code*), as defined in section 5020.1(k) of the *Public Resources Code* or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the *Public Resources Code*, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be a historic resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (*Public Resources Code* 5024.1, Title 14 *CCR*, Section 4800.3).

Under CEQA Section 15064.5, "generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings shall be considered as mitigated to a level of less than a significant impact on the historical resource."

California Register of Historic Resources. The California Register of Historical Resources (CRHR) includes buildings and structures formally determined eligible and/or listed through procedures adopted by the SHPO. A resource shall be considered to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code 5024.1, Title 14 CCR, Section 4800.3) as follows:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The CRHR also includes buildings previously determined eligible for listing in the NRHP. Therefore, buildings or districts determined to be eligible for the NRHP are also considered eligible for listing on the CRHR.

LOCAL REGULATIONS

San Francisco General Plan and Planning Code

The Planning Department considers a listing of historical resources approved by ordinance or resolution of the Board of Supervisors or the Planning Commission to be a local register of historical resources for the purposes of CEQA evaluation.[36] San Francisco Preservation Bulletin No. 16 provides guidance for the CEQA review process with regards to historic resources.

General Plan. The Urban Design Element of the *San Francisco General Plan* acknowledges the importance of historic structures within the City, and emphasizes the importance of older buildings for the "richness of character, texture and human scale that is unlikely to be repeated often in new development." These structures help to characterize many neighborhoods and serve as landmarks and focal points. *General Plan* policies regarding architectural resources are discussed in Objective 2 of the Urban Design Element:

> Objective 2: Conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.
>
> > Policy 2.4: Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.

San Francisco Planning Code. Adopted in 1967, Article 10 of the San Francisco *Planning Code* addresses the preservation of historical, architectural, and aesthetic landmarks, citywide.

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[36] Public Resources Code Sec. 5020.1(k) states, "'Local register of historical resources' means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution."

Article 10 is considered an adopted local register of historical resources under CEQA, as it is a part of the *Planning Code* and is therefore subject to formal action by the Board of Supervisors. Since 1967, 246 landmark sites and eleven historic districts have been adopted by the City. Article 10 provides for review of proposed alterations to properties listed as City landmarks and to certain properties within listed City Historic Districts. The *Planning Code* requires a special hearing prior to the demolition of designated properties but does not generally prohibit demolition. The project site is listed within the South End Historic District.

The following list is taken from Article 10 of the *Planning Code* and summarizes those physical features that, taken together, define the South End Historic District's special character and make it a visually recognizable place worthy of "preservation on an area basis rather than on the basis of individual structures alone." Accordingly, pursuant to Section 1006.7 of the *Planning Code*, "reasonable efforts must be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." The character-defining architectural/physical features of existing buildings in the historic district which merit preservation are:

1. Overall Form and Continuity: Building height is generally within a six-story range, and many of the oldest structures are one or two stories in height.
2. Scale and Proportion: The buildings are of typical warehouse design, large in bulk, often with large arches and openings originally designed for easy vehicular access. There is a regularity of overall form. The earlier brick structures blend easily with the scaled-down Beaux Arts forms of the turn of the century and the plain reinforced concrete structures characteristic of twentieth-century industrial architecture.
3. Fenestration: The earliest structures have few windows, expressing their warehouse function. The windows are varied in size, rhythmically spaced and deeply recessed, producing a strong shadow line and relating in shape and proportion to those in nearby buildings. Larger industrial sash windows began to be incorporated in structures built from the 1920s and onward. Door openings are often massive to facilitate transshipment of bulk materials.
4. Materials: Standard brick masonry is predominant for the oldest buildings in the District, with reinforced-concrete introduced after the 1906 fire, though its widespread use did not occur until the 1920s.
5. Color: Red brick is typical, with some yellow and painted brick. Muted earth tones predominate in shades of red, brown, green, gray and blue.
6. Texture: Typical facing materials give a rough textured appearance. The overall texture of the façades is rough grained.
7. Detail: Arches are common on the ground floor and are frequently repeated on upper floors. Flattened arches for window treatments are typical. Cornices are simple and

generally tend to be abstract versions of the more elaborate cornices found in downtown commercial structures from the nineteenth century. Most of the surfaces of the later buildings are plain and simple, reflecting their function. Some of the earlier brickwork contains suggestions of pilasters, again highly abstract. Where detailing occurs, it is often found around doors and windows.

Other Local Registers and Surveys

Here Today

In 1968, the Junior League of San Francisco published the results of a five-year-long survey of historic buildings in San Francisco, San Mateo, and Marin counties. Working with architectural, historic, and planning consultants, Junior League volunteers conducted research and surveyed the three counties. The resulting publication, Here Today, was one of the first major surveys of historic architectural resources in San Francisco, and is considered by the Planning Department an adopted local register of historical resources under CEQA, as the findings of this survey were adopted by the Board of Supervisors.

1976 Citywide Survey

The 1976 Architectural Quality Survey, or 1976 Survey as it is commonly called, was a reconnaissance or windshield survey. The survey examined the entire City and County of San Francisco to identify and rate buildings and structures. No research was performed and the potential historic significance of a resource was not considered when assigning ratings. Buildings rated 3 or higher represent approximately the top 2 percent of all of San Francisco's buildings in terms of architectural importance. Summary ratings of 0 or 1 are generally interpreted to mean that the property has some contextual importance. However, because the survey has not been officially adopted by City action, the 1976 Survey has not been recognized by the San Francisco Planning Department as a local register that would indicate if a property is a historical resource for the purposes of CEQA. Moreover, it should be noted that the 1976 Survey is over 30 years old and did not address historical associations. A building's inclusion in the 1976 Survey indicates to Planning staff that the building may be a resource and that more information is needed. The 178 Townsend Street building was given a rating of 3.

San Francisco Architectural Heritage

San Francisco Architectural Heritage (Heritage) is the City's oldest not-for-profit organization dedicated to increasing awareness and preservation of San Francisco's unique architectural heritage. Heritage has completed several major architectural surveys in San Francisco, the most important of which was the 1977-78 Downtown Survey. The primary survey area was

published in book form as *Splendid Survivors* in 1978.[37] The survey employed 13 rating categories in four headings: architecture, history, environment and integrity. Summary ratings from "A" to "D" were assigned to each building on the basis of evaluation in the 13 rating categories: "A"-rated buildings are of Highest Importance, "B"-rated buildings are of Major Importance, "C"-rated buildings are of Contextual Importance, and "D"-rated buildings are of Minor or No Importance. The 178 Townsend Street building was given a rating of A.

Unreinforced Masonry Building Survey, 1990

In 1990, the Landmarks Preservation Advisory Board (LPAB) completed an architectural and historical survey of Unreinforced Masonry Buildings (UMBs) in San Francisco built in-between 1850 to 1940, including the building at 178 Townsend. This report reviewed prior surveys, including the 1976 DCP Survey, the Heritage Survey, the *San Francisco General Plan* and Planning Code, and state and federal listings. The San Francisco Department of Building Inspection (DBI) compiled a list of approximately 2,000 UMBs in the City.

IMPACTS

METHODOLOGY

The former California Electric Light Company Station B building was assigned a California Historical Resource Status Code of '3D' by the Office of Historic Preservation, due to its status as a contributor to the locally-listed South End Historic District. According to the San Francisco Planning Department, pursuant to *San Francisco Preservation Bulletin No. 16 – City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources*, the California Electric Light Company Station B building falls into "Category A.2 – Adopted local registers, and properties that have been determined to appear eligible, or which may become eligible for the California Register." Therefore, the property is subject to the California Environmental Quality Act as a historic resource.

In August 2007 Wendy M. Hillis, AIA, and Page & Turnbull Architects prepared a HRE, which included a description of the proposed project, a description of the building and its surroundings, building history, historic significance of the building, and an evaluation of the potential impact from the proposed project using the CEQA significance criteria. Historic maps and photos as well as recent photos of the building were included to illustrate the information

[37] Page, Charles Hall & Associates; and Michael Corbett, *Splendid Survivors: San Francisco's Downtown Architectural Heritage*, prepared for the Foundation for San Francisco's Architectural Heritage, San Francisco: California Living Books, 1979.

provided. The background provided in this report was evaluated in the Planning Department's HRER, which forms the basis for the impact analysis for this EIR.

Under CEQA, a project that would result in a substantial adverse change in the significance of an historical resource would have a significant effect on the environment. A substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

Accordingly, this section analyzes the potential for the proposed project to adversely alter the physical characteristics of the California Electric Light Company Station B to a degree that would impair the South End Historic District. Although the subject property has merit on an individual basis, for CEQA purposes, the historic resource is the South End Historic District, and the property's role as a contributor to that district. The criteria used to determine significance of the potential effects of the proposed project on the California Electric Light Company Station B building in the context of the South End Historic District are described below.

SIGNIFICANCE CRITERIA

For the purposes of this EIR, impacts to cultural resources are considered significant if the proposed project would:

- Cause a substantial adverse change in the significance of a historic resource as defined in Section 21083.2 of CEQA.

To further refine what would constitute a substantial adverse change, character-defining features of the South End Historic District have been identified. Those features of the subject property that correspond to the physical features summarized in the previous section as the character-defining architectural/physical features of the District are highlighted. These features, although individual to the building, are also features that define the special character of the South End Historic District to which this building contributes. In the case of a historical resource, a substantial adverse change would involve modifications to the character-defining features associated with a building's period of significance, such that the material impairment of the historical resource occurs. In addition, specific features unique to the building that are not necessarily characteristic of the district as a whole but that may be deemed worthy of preservation are defined.

IMPACT EVALUATION

The proposed project would modify the California Electric Light Company's Station B to build the proposed five-story structure within the footprint of the existing building. The proposed structure would provide up to 85 dwelling units and up to 1,050 square feet of retail uses. The majority of the building's exterior walls and façades would be preserved intact; however, proposed changes to the structure are listed in Section II of this EIR, Project Description, and would include the following:

- In the front volume of the building, restoration of the first two existing bays of the building's post-and-beam wood truss system and replacement of the existing corrugated steel roof and fiberglass skylights with a new glass and steel skin;
- Removal of the existing corrugated roof and steel trusses and interior smokestack in the rear volume;
- Restoration of the central opening, "barn" doors and the two flanking window openings on the Townsend Street façade to their original 1899 condition;
- Re-opening of the existing pedestrian and vehicular openings for use as residential entries, and addition of a total of five new residential entries cut into the existing Clarence Place façade (four openings in the front volume, and one opening in the rear volume); and
- Preservation of existing windows along Clarence Place, and addition of four rectangular "strip" windows above the intermediate corbelled brick cornice of the rear volume.

Historical Significance and Character-Defining Features

The HRER identifies the period of significance of the building as 1888 to 1935, spanning the period from its original date of construction to the end date of significance for the historic district. This period encompasses both the building's original construction and use as a power generating station and its reconstruction and reuse after the 1906 earthquake as a hay and feed mill, drayage facility and general warehouse.

The building possesses significance on several levels not associated with its status for CEQA purposes as a contributor to the South End Historic District. First, Station B appears to be the last surviving nineteenth-century electric generating plant remaining in San Francisco, itself the first municipality in the world to enjoy citywide distribution of electric lighting.

Second, constructed in 1888, the former electricity generating plant is a good and very rare (in San Francisco) example of a nineteenth-century Commercial Style brick industrial structure and is significant as a work of one of nineteenth-century San Francisco's leading architectural firms: Percy & Hamilton. Although utilitarian in most aspects, the building incorporates subtle

architectural detailing intended to relieve its otherwise harsh exterior. Although the subject building predates the City Beautiful Movement by a decade, its design vocabulary clearly reflects an early interest in the beautification of industrial buildings. Industrial buildings built during the late nineteenth century were typically utilitarian in design, yet the architectural firm of Percy & Hamilton applied simple, ornamental details to embellish what would otherwise be a plain, boxy structure. The design of Station B was an early predecessor of the substation type later perfected by PG&E, a unique feature of the building in its own right. The building's walls are constructed of brick, a thick and solid masonry envelope necessary in the construction of a building with an unusually high risk of fire. Yet elevations that could easily have been purely functional and windowless were decorated with segmentally arched window and door openings and corbelled cornices. The roofs were built of galvanized iron, a typical material used in the construction of industrial buildings; yet Percy & Hamilton built parapets on the ends of the two roofs to hide the unattractive, but fireproof, material. It was these subtle, but elegant, touches that resulted in a unique and attractive utilitarian building.

For CEQA purposes, Station B is a resource due to its status as a contributor to the South End Historic District. Per Section 8.1 of the South End District Ordinance[38], contributory buildings are those "which date from the Historic District's period of significance and retain their historic integrity. These structures are of the highest importance in maintaining the character of the Historic District."

The following list comprises the character-defining features of the building that are associated with its status as a contributor to the South End Historic District (see p. 111.B-17):

- Rectangular volume
- Red brick walls
- Pilasters
- Stepped parapets
- Gable roof form
- Stepped brick cornice
- Intermediate corbelled brick cornice
- Linear brick detailing of minimal relief
- Brick/concrete water table at rear volume

[38] City and County of San Francisco *Planning Code*, Appendix I to Article 10. South End Historic District.

- Rhythmically spaced, small, punched window openings on Clarence Place contrasted with larger vehicular entrances on both Clarence Place and Townsend Street
- Flattened arched window and door openings
- Multi-lite window sash
- Arched vehicular entrances at front façade and middle demising wall
- Painted signage on Clarence Place
- Interior brick flue
- Central organization and linearity of interior space with repetitive columns and roof trusses
- Accretive character of Clarence Place façade – reflecting continual changes in use and modifications.

Other features that possess importance to the building's history, but not to the surrounding Historic District, include:

- Interior brick smokestack (extant portions)
- Centrally-organized and linear plan
- Repetitive timber columns
- Timber trusses (only extant historic trusses – first two trusses in front volume)
- Steel roof trusses

It should be noted that the California Electric Light Company Station B building is not eligible for individual listing as a San Francisco City Landmark, as determined by the City and County of San Francisco.

Compatibility with the South End Historic District

Utilizing the Key Architectural/Physical Features of the Historic District defined in Article 10 of the San Francisco *Planning Code*, the HRE and the HRER assess the project's compatibility with the Historic District's character-defining features based on its overall form and continuity, scale, and proportion, fenestration, materials, color, texture, and detail.

The HRER determined that the proposed project was consistent with the overall form and continuity of the South End Historic District because there are several other buildings adjacent to the project site with similar heights and forms. The contributing buildings in the South End Historic District are generally older warehouses, large and rectangular, often with large arches and doorways designed for easy vehicular access. The proposed project would retain and in some cases, restore, large arched openings characteristic of the surrounding area. The proposed

project would retain the arched brick opening in the center of the Townsend Street façade, and the four distinct vehicular sized openings on the Clarence Street façade (one in the front volume and three in the rear volume). The HRER concludes that "[t]he addition will not overwhelm the existing structure in massing, scale and proportion" because the height of the addition would be lower than that of the surrounding buildings and the setback of the addition from the street would be 40 feet from the Townsend Street façade, setting the historic building apart from surrounding modern structures. With the proposed vertical addition, the subject property would remain lower than the predominate building heights in the district. Based on these findings, the project would be consistent with the overall form, continuity, scale and proportion of the Historic District.

Fenestration, the placement of windows and doorways, affects the visual character of building facades. In South End Historic District contributory buildings, there are generally a few windows along each building façade that are varied in size, rhythmically spaced, deeply recessed, and which produce a strong shadow line. Fenestration tends to be consistent throughout the Historic District, creating a repeating pattern, or "rhythm". Door openings are often massive, built to facilitate easy access of vehicles and materials. These features are expressed along the Clarence Place façade of Station B. The proposed project would retain and rehabilitate all of the existing arched window and door openings. The project would also add four new window openings above the corbelled brick cornice. The HRER notes that the proposed project's new window openings would reinforce the building's existing fenestration pattern, follow the characteristics of the punched openings of the Historic District, and would furthermore, be located at the less-visible rear of the building. Therefore, the proposed project would not result in a substantial adverse change to the existing building.

The oldest buildings within the Historic District are predominantly composed of standard brick masonry, with reinforced concrete introduced after the 1906 fire. With the exception of the aforementioned new windows, the proposed project would retain and preserve the existing brick masonry walls of the Station B building. The red-brick character of the Townsend Street and Clarence Place facades will be preserved.

The materials proposed for the new structure are intended to differentiate the new building from the historic. Smooth glass and polished steel in blue and green tones would contrast with the heavy, textured red brick that defines the industrial character of the surrounding Historic District. The HRER notes that the proposed glass-façade addition, while visible from the public right-of-way, would provide a visually light contrast to the heavy brick masonry that characterizes the South End Historic District. Historic colors for the district include primarily red brick with some yellow and painted brick and predominately consist of muted earth tones.

The proposed project would not involve painting or coating of the existing brick in a non-historic color. The new construction would feature colors such as greens and blues that are clearly distinguished from the existing building and surrounding district. The proposed project would cause the historic fabric to stand out in contrast to modern materials, highlighting the Historic District features.

Architectural details of the Historic District generally include arches on the ground floor, which are frequently repeated on upper floors, and flattened arches for window treatments. Cornices are simple and tend to be abstract versions of more elaborate versions found in the downtown commercial structures from the nineteenth century. Most of the surfaces are plain and simple, reflecting their function, with details often found surrounding entryways. The arched openings on Townsend Street and the arched window openings and vehicular entrances on Clarence Place reflect these characteristics. The proposed project would retain in place and preserve the arched brickwork, cornices, and openings of the building, and would be compatible with the details that characterize the surrounding Historic District.

Overall, the proposed project would be compatible with the general characteristics of the South End Historic District and would preserve those architectural features of the California Electric Light Company Station B building that contribute to the surrounding Historic District. The new construction would be clearly differentiated from the historic portions of the building. For the reasons discussed above, the proposed project would not adversely impact the ability of the property to contribute to the South End Historic District.

Compatibility with the Secretary of the Interior's Standards

Station B is a historic resource as defined by CEQA; therefore, the impacts of the proposed project must be determined. Under CEQA Section 15064.5, "generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings shall be considered as mitigated to a level of less than a significant impact on the historical resource." However, conformity with the standards is not the sole criteria for determining whether a project would cause a substantial adverse change in the significance of a historic resource; therefore, failure to comply with the standards may or may not constitute a significant impact or substantial adverse change under CEQA.

There are four treatment options discussed in the standards: preservation, rehabilitation, restoration and reconstruction. For this project, the rehabilitation standards are used because these standards are typically applied to buildings undergoing a change in use or that require a

significant amount of work to bring them into compliance with contemporary life-safety, seismic and accessibility codes. The act of rehabilitation assumes that existing historic fabric has become damaged or deteriorated over time, and as a result, more latitude is given to replacing damaged or missing materials, using either traditional or substitute materials.

The HRE evaluated the project with respect to each of the ten rehabilitation standards for both the purposes of CEQA-required impact analysis and the need to inform consideration of the Certificate of Appropriateness under Article 10 of the *Planning Code*. The HRE discusses each of the standards in detail, but Standard 9 is most relevant to the proposed project, as it pertains to alterations and additions. Standard 9 reads as follows:

> New additions, exterior alterations, or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale, proportion and massing to protect the integrity of the property and its environment.

The design of the proposed addition is intended to: 1) result in minimal damage and alteration to the historic features, protecting the integrity of the building itself; and 2) contrast with the existing façade, highlighting the defining South End Historic District features. The design strategies used to achieve these ends and the conclusions of the HRER with respect to these strategies are discussed below.

Although the brick exterior of Station B was altered at several points during the building's lifetime, numerous character-defining features (summarized above) remain intact. The project would result in the removal of some historic materials including removal of limited portions of historic brick from the new openings from the Clarence Place façade, much of the wood framing in the front volume, and the steel trusses in the rear volume. However, the removal of the historic brick for new openings would not be considered detrimental to the building's historic integrity. As stated previously, the new openings would match the rhythm of the building exterior and would be located towards the rear of the building. The HRE found that the majority of the wood framing lacked historical integrity and that the steel trusses do not contribute to the character of the surrounding Historic District. The proposed project would also result in the removal of the interior smokestack and the corrugated metal roof. The HRER concluded that these changes would not detract from the Historic District or the value of the building as a historic resource. On the other hand, features of the existing building that do contribute to the value of Station B as a South End Historic District contributory building, such

as the massing, parapets, gables, cornices, texture and color (discussed above) would not be altered.

Finally, although it is important to ensure that the final design of a renovation project protects the integrity of a historic resource, it is also important to ensure that the construction process used for renovation would not cause undue harm to the integrity of the resource. The proposed project would adhere to the general materials guidelines for restoration set by the Secretary of the Interior's Standards. Masonry repair, replacement, salvage, restoration of filled historic openings, cleaning, and preservation of a historic painted sign would be conducted according to these standards.

CONCLUSION

Station B is unique in San Francisco as the sole remaining power generating plant constructed prior to the 1906 earthquake. Although heavily modified in 1908 to accommodate its new use as a feed mill and hay warehouse and to repair damage sustained during the earthquake, the industrial character of the building remains intact. Many major repairs and alterations to the original structure add, rather than detract from the building's history. Both the HRER and the HRE confirm that the building is a contributor to the South End Historic District for the 1888 to 1935 period of significance, pursuant to Article 10 of the San Francisco *Planning Code*. Therefore the building is considered to be a historic resource under CEQA.

The CEQA analysis was conducted using the HRE, an independent historic resources evaluation prepared by Wendy M. Hillis, AIA and Page & Turnbull, for background, and the HRER, the response to the HRE prepared by the San Francisco Planning Department, for the impact analysis. According to both the HRE and the HRER, the proposed project would not result in an adverse effect on the character of the South End Historic District. The proposed project would minimize the visual and physical impacts on the historic building by placing the five-story condominium addition within the walls of the existing structure and by proposing setbacks and massing that would reduce the visual imposition of the addition. The use of visually light materials such as glass and steel for the addition would contrast with the heavy texture and dark red color of the existing brick façade typical of the South End Historic District. The fenestration and architectural detailing of the building exterior would be preserved, and where necessary, repaired, to preserve the historic character of Station B. Because the proposed project would not result in substantial changes to the building with regard to any of the character defining features of the Historic District, the project does not detract from the significance of Station B as a contributor to the Historic District or from the overall integrity of the building.

For these reasons, the proposed project would not result in a significant impact to historic resources.

C. TRANSPORTATION

This chapter summarizes the information presented in the *178 Townsend Traffic Study*[39] conducted by LCW Consulting under the direction of the Planning Department.

ENVIRONMENTAL SETTING

REGIONAL ACCESS

This section provides a discussion of the existing regional roadway network in the vicinity of the proposed project, including the location of the nearest freeway on-ramps and off-ramps (See Figure 19).

United States 101 ("U.S. 101") and Interstate 80 ("I-80") provide the primary regional access to the project site. U.S. 101 serves San Francisco, the South Bay, and the North Bay via the Golden Gate Bridge. The San Francisco-Oakland Bay Bridge is part of I-80 and connects San Francisco with the East Bay. U.S. 101 merges with I-80 to the southwest of the project site. Access to the project site from I-80 westbound is via the Fremont Street and Harrison Street off-ramps. Access to I-80 westbound from the project site is via the Fourth Street/Harrison Street on-ramp. Access to the project site from I-80 eastbound is via the Fourth Street/Bryant Street off-ramp; and access to I-80 eastbound from the project site is via the First Street, Essex Street and Sterling Street (peak period High Occupancy Vehicle only) on-ramps.

Interstate 280 (I-280) provides regional access from the South of Market area of downtown San Francisco to southwest San Francisco and the South Bay/Peninsula. I-280 and U.S. 101 have an interchange south of downtown San Francisco. Nearby access points for the project site to I-280 are located at King Street (west of Fourth Street) and Sixth Street (at Brannan Street).

LOCAL STREETS

This section provides a discussion of the existing local roadway system in the vicinity of the project site, including the roadway designation, number of travel lanes, and traffic flow directions. In the South of Market area, streets that run in the northwest/southeast direction (such as Second Street) are generally considered north-south streets, whereas streets that run in the southwest/northeast direction (such as Townsend Street) are generally considered east-west streets.

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[39] LCW Consulting, *178 Townsend Final Transportation Study, June 8, 2007.* This report is available for public review by appointment at the Planning Department, 1660 Mission Street, 5th Floor, Project File No. 2005.0470E.

SOURCE: EIP Associates, a division of PBS&J.

178 TOWNSEND STREET PROJECT

FIGURE 19: STUDY AREA AND ANALYSIS LOCATIONS

King Street runs between The Embarcadero and Division/De Haro Streets. West of Fourth Street, King Street connects with the I-280 ramps. King Street has two travel lanes in each direction, and parking is generally permitted on the north side of the street. In the *San Francisco General Plan*, King Street is identified as a Major Arterial in the CMP Network, a Metropolitan Transportation System (MTS) Street, a Transit Preferential Street (Transit Important), and a Neighborhood Network Connection Street.

Townsend Street runs between The Embarcadero and Eighth/Division Streets. Townsend Street generally has two travel lanes in each direction; however, between Second Street and The Embarcadero, Townsend Street has one travel lane in each direction. Parking is generally provided on both sides of the street. Bicycle route #36 runs the length of Townsend Street.

Brannan Street runs between The Embarcadero and Potrero Boulevard/Division Street. In the vicinity of the project site, Brannan Street has two travel lanes in each direction, and parking on both sides of the street. The *General Plan* identifies Brannan Street between Fifth and Sixth Streets, and between Ninth and Division Streets, as a Major Arterial in the CMP Network and an MTS Street.

Bryant Street runs between The Embarcadero and Precita Avenue (south of Cesar Chavez Street). Between Second Street and Eleventh Street, Bryant Street is a one-way eastbound arterial with four travel lanes. East of Second Street, Bryant Street operates one-way eastbound to the Sterling Street on-ramp to I-80, and operates both eastbound and westbound (one lane in each direction) between Sterling Street and The Embarcadero. The *General Plan* identifies Bryant Street as a Major Arterial in the CMP Network, an MTS Street, a Transit Preferential Street (Transit Important), and a Neighborhood Commercial Street.

The Embarcadero runs between China Basin in the project vicinity and Taylor Street, near Fisherman's Wharf. In general, The Embarcadero has two travel lanes in each direction with a 30-foot wide center median for the T-Third, N-Judah and F-Market transit lines, and parking on both sides of the street. The *General Plan* identifies The Embarcadero as a Major Arterial in the CMP Network, a MTS Street, a Transit Preferential Street, and a Neighborhood Commercial Street. In addition, The Embarcadero is part of the #5 bicycle route and is part of the Bay, Ridge, and Coast Trails, which are recreational pedestrian/bicycle paths that connect several Bay Area cities.

Second Street runs between Market Street and King Street, with two lanes in both the northbound and southbound directions. Between Mission and Market Streets, only one

northbound lane is provided and all northbound traffic must turn right at Market Street. Second Street is designated as a Neighborhood Commercial Street in the *General Plan*. In addition, Second Street is part of the #11 bicycle route.

Clarence Place is a mid-block alley between Second and Third Streets, with sole access from Townsend Street. The alley is about 35 feet wide, with no sidewalks. There are six on-street parking spaces (two-hour parking) on the west side of the street, there is a "No Standing" restriction on the east side of the street. Clarence Place provides vehicular access to adjacent buildings, including loading docks on the west side of the street. At the north end of the street (north of the project site), Clarence Place provides access to commercial offices and private residences.

Third Street runs between Bayshore Boulevard and Market Street. North of Townsend Street, Third Street is a one-way northbound roadway. In the vicinity of the project site, Third Street has five to six travel lanes, and one lane is reserved for transit vehicles. On-street parking is generally provided along both sides of the street, but is prohibited during the morning and afternoon commute periods. In the *General Plan*, Third Street is designated as a Major Arterial in the CMP Network, a MTS street, a Transit Preferential Street (Transit Important), a Citywide Pedestrian Network Street and a Neighborhood Commercial Street.

INTERSECTION LEVEL OF SERVICE CONDITIONS

Existing intersection operating conditions were evaluated for intersection Level of Service during the weekday PM peak hour (generally between 5:00 and 6:00 PM) of the PM peak period (4:00 to 6:00 PM) for the following seven intersections in the vicinity of the proposed project:

- Second Street/King Street
- Third Street/King Street
- Second Street/Townsend Street
- Third Street/Townsend Street
- Second Street/Brannan Street
- Third Street/Brannan Street
- Second Street/Bryant Street

Intersection turning movement volumes were counted on Thursday, April 27, 2006 at the seven study intersections, shown in Figure 19.

All of the study intersections are signalized. The operating characteristics of signalized intersections are described by the concept of Level of Service (LOS). LOS is a qualitative description of an intersection's performance based on the average delay per vehicle. Intersection levels of service range from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. LOS A through D are considered excellent to satisfactory service levels, LOS E is undesirable, and LOS F conditions are unacceptable.

The study intersections were evaluated using the 2000 Highway Capacity Manual methodology ("HCM"). For signalized intersections, this methodology determines the capacity for each lane group approaching the intersection. The LOS is then based on average delay per vehicle (in seconds per vehicle) for the various movements within the intersection. A combined weighted average delay and LOS is presented for the intersection. In San Francisco, LOS E and F are considered unacceptable operating conditions for signalized intersections.

Table 3 presents the results of the intersection LOS analysis for the existing weekday PM peak hour conditions. During the weekday PM peak hour, overall operating conditions at the study intersections are generally acceptable (at level of service conditions of LOS D or better), with the exception of the intersection of Third Street/King Street which operates at LOS E. The poor operating conditions at this intersection are generally due to the high volume of vehicles (both through and turning vehicles) that are approaching and departing the I-280 ramps on King Street.

It should be noted that games and special events at AT&T Park affect traffic operations at a number of intersections in the immediate vicinity of the project site. Transportation impacts associated with game day conditions are most severe prior to games and after the conclusion of games. The greatest impact occurs after weekday afternoon sellout events, during the 3:30 to 4:40 PM period (particularly following Thursday and Friday afternoon games) when traffic, transit and pedestrian flows exiting the ballpark coincide with the early commute period already on the transportation network before the peak commute hour. During the 2006 season, there were 81 regular-season home games, including 14 weekday day games, 41 weekday evening/night games and 26 weekend games. In addition, non-baseball large special events (e.g., concerts, soccer games, college football) are held at the ballpark on about ten days a year.[40]

[40] AT&T Park, Information on Special Events, 2006. Obtained from Sara Hunt, AT& T Park, 9/11/06.

TABLE 3
INTERSECTION LEVEL OF SERVICE
EXISTING CONDITIONS – WEEKDAY PM PEAK HOUR

Intersection	Delay[a]	LOS[b]
1. Second/King	49.9	D
2. Third/King[c]	**67.1**	**E**
3. Second/Townsend	16.1	B
4. Third/Townsend	22.0	C
5. Second/Brannan	12.9	B
6. Third/Brannan	30.0	C
7. Second/Bryant	44.6	D

Source: LCW Consulting, June 2007.

Notes:

a. Delay presented in seconds per vehicle.

b. Intersections operating at LOS E or F are highlighted in bold.

c. The volume-to-capacity (v/c) ratio for the intersection of Third/King is 0.94.

TRANSIT CONDITIONS

The project site is well-served by public transit, with both local and regional service provided nearby. Local service is provided by the San Francisco Municipal Railway (Muni) bus, and light rail lines. In addition, the project site is located near the Caltrain terminal and the N-Judah and T-Third light rail lines. Service to and from the East Bay is provided by BART, AC Transit and ferries; service to and from the North Bay is provided by Golden Gate Transit buses and ferries, which are accessible via local transit; service to and from the Peninsula and South Bay is provided by Caltrain, SamTrans, and BART.

Muni provides transit service within the City and County of San Francisco, including bus (both diesel and electric trolley), light rail (Muni Metro), cable car, and electric streetcar lines. Muni operates seven bus lines and two light rail lines within the vicinity of the project site, including several cross-town bus lines that serve the downtown area and vicinity of the Transbay Terminal, located on Mission Street between First and Fremont Streets, about seven blocks (one mile) northeast of the project site.

Table 4 presents the service frequencies and nearest stop locations for lines that operate near the project site. The 80X-Gateway Express, 81X-Caltrain Express and 82X-Presidio and Wharves Express provide peak period, peak direction service only (i.e., northbound, during the morning commute period, and southbound during the evening commute period). The closest Muni Metro stop for the N-Judah and T-Third lines is on King Street at Second Street.

TABLE 4
NEARBY WEEKDAY MUNI SERVICE

Route	Service Frequency (min.)			Nearest Stop Location (inbound, outbound)
	AM	Midday	PM	
10-Townsend	8	15	8	Second/Brannan, Third/Brannan
30-Stockton	9	9	9	Townsend/Fourth, Third/Brannan
45- Union-Stockton	9	9	9	Townsend/Fourth, Third/Brannan
80X-Gateway Express	Service scheduled to meet Caltrain			Fourth/Townsend, Townsend/Fourth
81X-Caltrain Express	Service scheduled to meet Caltrain			Fourth/Townsend, Fourth/Townsend
82X-Presidio & Wharves	Service scheduled to meet Caltrain			Fourth/Townsend, Fourth/Townsend
T-Third	10	10	8	King/Second
N-Judah	7	10	7	King/Second

Source: San Francisco Muni, LCW Consulting, June 2007.

In April 2007 regular service began on the T-Third light rail line. This new Muni Metro line operates from the Castro Station, down Market Street via the subway, along The Embarcadero, and down Third Street and Bayshore Boulevard to Sunnydale Avenue. Within the Market Street subway, the T-Third combines with the K-Ingleside light rail service. With implementation of the T-Third service, the 15-Third bus line was discontinued.

Table 5 presents the ridership and capacity utilization at the maximum load point for the nearby Muni lines during the weekday PM peak hour. Capacity utilization relates the number of passengers per transit vehicle to the design capacity of the vehicle. The capacity per vehicle includes both seated and standing capacity, where standing capacity is somewhere between 30 to 80 percent of seated capacity (depending upon the specific transit vehicle configuration). Capacity utilization is calculated at the maximum load point (MLP), the transit stop with the greatest demand. Muni's capacity utilization standard is 85 percent of total capacity.

As indicated in Table 5, the maximum load points for the bus lines serving the project area occur north of the project site in both the inbound and outbound directions. The maximum load point for the T-Third light rail line occurs at Fourth/King, while capacity utilization for the N-Judah occurs at the Van Ness station. With the exception of the 30-Stockton and the 45-Union-Stockton bus lines, and the N-Judah light rail line, the bus and light rail lines serving the project area operate at less than capacity utilization at the maximum load point. In the immediate vicinity of the project site, the bus and light rail lines have available capacity to accommodate additional passengers.

TABLE 5
MUNI RIDERSHIP AND CAPACITY UTILIZATION AT MAXIMUM LOAD POINT
EXISTING CONDITIONS – WEEKDAY PM PEAK HOUR

Line/Direction of Travel	Hourly Ridership	Capacity Utilization	Maximum Load Point
Inbound (towards downtown)			
10-Townsend	45	20%	Sansome/Sacramento
30-Stockton	855	116%	Stockton/Sutter
45-Union Stockton	913	146%	Stockton/Sutter
T-Third	427	62%	Fourth/King
J-Church	216	30%	Van Ness station
Outbound (leaving downtown)			
10-Townsend	150	56%	Sansome/California
30-Stockton	797	105%	Stockton/Sutter
45-Union Stockton	519	87%	Stockton/Sutter
80X- Gateway Express	84	28%	Beale/Mission
81X-Caltrain Express	38	17%	Beale/Mission
82X-Presidio & Wharves	133	53%	Beale/Mission
T-Third	424	71%	Fourth/King
N-Judah	1893	88%	Van Ness station

Source: Muni Monitoring Data, LCW Consulting, June 2007.
Note: In April 2007, the 15-Third line was replaced with the T-Third light rail line. Ridership and capacity utilization is presented for the 15-Third bus line, as ridership information on the T-Third not available.

BART operates regional rail transit service in the metropolitan Bay Area. BART currently operates five lines: Pittsburg/Bay Point to Daly City, Fremont to Daly City, Richmond to Daly City, Fremont to Richmond, Dublin/Pleasanton to San Francisco International Airport (SFIA)/Millbrae. Within downtown San Francisco, BART operates underground below Market Street. During the weekday PM peak period, headways are generally 5 to 15 minutes for each line. The nearest BART station to the proposed project is the Montgomery Station, located about seven blocks (about one mile) north of the project site, and could be accessed from the project site via the T-Third and N-Judah light rail lines.

During the PM peak period, the non-express Muni lines serving the project area have available capacity in the vicinity of the site to accommodate additional passengers. The maximum load points for the 10-Townsend, 30-Stockton, and 45-Union-Stockton bus lines occur north of the project site for both the inbound and outbound directions.

BART operates regional rail transit service in the metropolitan Bay Area. BART currently operates five lines: Pittsburg/Bay Point to Daly City, Fremont to Daly City, Richmond to Daly City, Fremont to Richmond and Dublin/Pleasanton to San Francisco International Airport (SFIA)/Millbrae. Within downtown San Francisco, BART operates underground below Market Street. During the weekday PM peak period, headways are generally five to 15 minutes for each line. The nearest BART station to the proposed project is the Montgomery Station, located about seven blocks (about one mile) north of the project site, and may be accessed from the project site via the N-Judah and T-Third light rail lines.

Caltrain provides rail passenger service on the Peninsula between Gilroy and San Francisco. The San Francisco terminal is located at the intersection of Fourth Street and Townsend Street (about one block west of the project site). Caltrain currently operates 48 trains in each direction each weekday, with a combination of express and local service. Headways during the evening peak period are approximately 5 to 30 minutes.

SamTrans, operated by the San Mateo County Transit District, provides bus service between San Mateo County and San Francisco. SamTrans operates 14 bus lines which serve San Francisco, including 12 routes into the downtown area. In general, SamTrans service to downtown San Francisco operates along Mission Street to the Transbay Terminal, located on Mission Street between First and Fremont Streets, about seven blocks (one mile) northeast of the project site.

Golden Gate Transit, operated by the Golden Gate Bridge, Highway, and Transportation District, provides bus service between the North Bay (Marin and Sonoma Counties) and San Francisco. Golden Gate Transit operates 22 commute bus routes, nine basic bus routes and 16 ferry feeder bus routes into San Francisco, several of which are at or near the Transbay Terminal. Basic bus routes operate at regular intervals of 15 to 90 minutes depending on the time and day of week. Commute and ferry feeder bus routes operate at more frequent intervals in the mornings and evenings. Golden Gate Transit also operates ferry service between the North Bay and San Francisco. During the morning and evening commute periods, ferries are operated between Larkspur and San Francisco, and between Sausalito and San Francisco. The San Francisco terminal is located at the Ferry Building, at The Embarcadero near Market Street, and may be accessed from the project site via the T-Third and N-Judah light rail lines.

AC Transit is the primary bus operator for the East Bay, including Alameda and western Contra Costa Counties. AC Transit operates 37 routes between the East Bay and San Francisco, all of which terminate at the Transbay Terminal (located about one mile northeast of the project site).

Most transbay service is peak-hour and peak-direction (to San Francisco during the AM peak period and from San Francisco during the PM peak period), with headways of 15 to 30 minutes per route.

PEDESTRIAN CONDITIONS

In the vicinity of the project site, pedestrian volumes are light to moderate throughout the day. Overall, the sidewalks and crosswalks adjacent to the proposed project were observed to be operating under satisfactory conditions, with pedestrians moving at normal walking speeds and with freedom to bypass other pedestrians.

It should be noted that before and after games and special events at the AT&T Park, the number of pedestrians on area sidewalks increases substantially. Most pedestrians north of King Street are destined to and from Market Street and parking facilities north of the ballpark, and higher pedestrian volumes are generally limited to The Embarcadero and the north-south streets (Second Street, Third Street), although pedestrian volumes also increase on east-west streets.

BICYCLE CONDITIONS

In the vicinity of the project site, Townsend Street, Second Street and The Embarcadero are designated Citywide Bicycle Routes. These routes are interconnected to the Citywide Bicycle Network and provide access to and from the study area from locations throughout the City.

Route #5 runs in both directions along The Embarcadero and King Street and is a Class II facility (signed route with bicycle lane). Route #11 runs along Second Street and is a Class III facility (shared travel route) between Market and King Streets. The addition of a bicycle lane on Second Street between Market and King Streets, to be achieved through removal of one to two travel lanes, has been identified as one of the 20 priority projects in the *2005 Bicycle Plan.*[41]

Route #36 runs along Townsend Street between Division Street and The Embarcadero. It is a Class II facility between Division and Third Streets, and a Class III facility between Third Street and The Embarcadero. The creation of bicycle lanes on Townsend Street between Eighth Street and The Embarcadero has been identified as one of 20 priority projects in the *2005 Bicycle Plan;* creation of bicycle lanes on Townsend Street could be achieved by reducing travel lanes,

[41] The *2005 Bicycle Plan* includes specific projects and design elements to improve the bicycle infrastructure and policies to support bicycling in San Francisco. Per the recent ruling by the San Francisco Superior Court, the City has initiated CEQA evaluation of the *2005 Bicycle Plan,* including the Policy Framework and the Network Improvement sections of the plan.

changing 90-degree angle parking to parallel parking, or by eliminating a travel lane and providing a center turn lane.

During field surveys, few bicyclists were observed to be riding in the vicinity of the project site. In general, during both the weekday midday and evening periods, bicycle conditions were observed to be operating acceptably, with only minor conflicts between bicyclists, pedestrians and vehicles.

PARKING CONDITIONS

The existing parking conditions were examined within a parking study area generally bounded by Bryant Street to the north, Delancey Street to the east, King Street to the south, and Fourth Street to the west. Parking occupancy was assessed for the weekday midday period (1:00 to 3:00 PM) and the weekday evening period (6:30 to 8:00 PM).

There are eight public parking facilities in the study area, including the proposed project site in its current use. With the exception of the surface parking lots at 240 and 470 Brannan Street, all facilities are accessory parking garages. Table 6 presents the parking supply and occupancy of the off-street parking facilities. The majority of the parking facilities serve the daytime office and commercial uses in the area, and are open generally between 7:00 AM to 7:00 PM. However, during ballpark event days, a number of the facilities are open for event parking, and close one hour following the end of the event. Overnight parking is available at the two surface parking lots, and at the parking garage at 250-266 King Street.

TABLE 6
OFF-STREET PARKING SUPPLY AND UTILIZATION

		Weekday Midday			Weekday Evening		
#	Type	Spaces	Occupied Spaces	Percent Occupied	Spaces	Occupied Spaces	Percent Occupied
1	470 Brannan Street	117	97	83%	117	17	15%
2	475 Brannan Street	180	171	90%	—	—	— %
3	178 Townsend Street	110	110	100%	—	—	— %
4	136 Townsend Street	100	100	100%	—	—	— %
5	153 King Street	370	350	95%	—	—	— %
6	680 Second Street	180	164	91%	—	—	— %
7	240 Brannan Street	120	120	100%	80	10	13%
8	250-266 King Street	300	210	70%	300	100	30%
Total		**1,477**	**1,322**	**90%**	**497**	**127**	**26%**

Source: LCW Consulting, June 2007.

There are about 1,475 parking spaces in the eight parking facilities. Field surveys during the weekday midday (on a non-event day) indicated that these facilities operate at capacity during the weekday midday (90 percent occupied). During the evening, the three facilities that provide overnight parking were about 26 percent occupied, and have available capacity to accommodate additional vehicles.

The existing on-street parking conditions were assessed during the same time periods as the off-street parking facilities. In general, on-street parking within the vicinity of the project site is comprised of metered and un-metered spaces, with 1-hour and 2-hour limits. In addition, there are several yellow loading zones located near businesses.

Table 7 presents a summary of the parking supply within the parking study area, and the weekday midday and evening occupancies. There are about 800 on-street parking spaces within the study area. Overall, during the weekday midday the on-street parking spaces within the study area were about 78 percent occupied, and during the weekday evening the on-street parking spaces were about 90 percent occupied.

TABLE 7
ON-STREET PARKING SUPPLY AND UTILIZATION

		Weekday Midday		Weekday Evening	
Street	Supply	Occupied Spaces	Percent Occupancy	Occupied Spaces	Percent Occupancy
Bryant St – Fourth to Delancey	134	69	51%	119	89%
Brannan St – Fourth to Delancey	192	171	89%	184	96%
Townsend St – Fourth to Delancey	134	132	99%	110	82%
King St – Fourth to Delancey	44	37	84%	44	100%
Fourth St – Bryant to King	52	35	67%	51	98%
Third St – Bryant to King	87	56	64%	80	92%
Second St – Bryant to King	74	68	92%	65	88%
Delancey St – Bryant to Townsend	95	66	69%	79	83%
Total	**812**	**634**	**78%**	**732**	**90%**

Source: LCW Consulting, May 2007.

Brannan Street, Townsend Street, and Second Street have one-hour or two-hour parking restrictions from 9:00 AM to 6:00 PM Mondays through Saturdays, from November through March, and from 9:00 AM to 10:00 PM Mondays through Friday and from 9:00 AM to 6:00 PM Saturdays and Sundays from April through October. Townsend Street and Brannan Street have two-hour parking restrictions, and Second Street has one-hour parking restrictions. Third Street

has metered parking on both sides of the street, and a "Tow-away" restriction on the east side between 7:00 and 9:00 AM, and 4:00 and 7:00 PM.

On Clarence Place there are approximately six un-metered, two-hour parking spaces on the west side of the street. There is a "No Standing" restriction on the east side of Clarence Place.

IMPACTS

SIGNIFICANCE CRITERIA

The following are the significance criteria used by the Planning Department for the determination of impacts associated with a proposed project:

- The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection level of service to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. The operational impacts on unsignalized intersections are considered potentially significant if project-related traffic causes the level of service at the worst approach to deteriorate from LOS D or better to LOS E or F and Caltrans signal warrants would be met, or would cause Caltrans signal warrants to be met when the worst approach is already operating at LOS E or F. The project may result in significant adverse impacts at intersections that operate at LOS E or F under existing conditions depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.
- San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines Section 15131 (a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impact, such as increased traffic impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxies, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel

habits. Any such resulting shifts to transit service, in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation." The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is not available. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the project site would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potentially secondary effects.

- The project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the MUNI and regional transit screenlines analyses, the project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the PM peak hour.
- The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.
- The project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.
- Loading impacts were assessed by comparing the proposed loading space supply to the *Planning Code* requirements and the estimated loading demand during the peak hour of loading activities.
- Construction-related impacts generally would not be considered significant due to their temporary and limited duration.

TRIP GENERATION

The person-trip generation for the proposed project includes trips made by residents and visitors to and from the proposed residential and retail uses. Person-trip generation is based on daily and weekday PM peak hour trip generation rates (number of trips per unit for the

residential uses and trips per 1,000 gsf for the retail uses) provided in the *SF Guidelines*. Table 8 presents the weekday daily and PM peak hour trip generation rates and daily and PM peak hour person trips generated by the proposed uses. The proposed project would generate about 1,077 person-trips (inbound and outbound) on a weekday daily basis, and 157 person-trips during the weekday PM peak hour.

TABLE 8
PROPOSED PROJECT PERSON –TRIP GENERATION

		Person-Trip Rates		Person-Trips	
Land Use	Size	Daily Trip Rate	PM Peak Hour as % of Daily	Daily	PM Peak Hour
Residential					
Studio/one bedrooms	51 units	7.5 per unit	17.3%	383	66
Two+ bedrooms	34 units	10.0 per unit	17.3%	340	59
Retail	2,357 gsf	150 per 1,000 gsf	9.0%	354	32
			Total	**1,077**	**157**

Source: SF Guidelines, LCW Consulting, June 2007.

MODE SPLIT

The project-generated person-trips were assigned to travel modes in order to determine the number of auto, transit, and "other" trips. "Other" includes walk, bicycle, motorcycle, taxi, and additional modes. Mode split information for the residential uses was based on the 2000 U.S. Census journey-to-work data for Census Tract 179.01. Mode split information for the retail uses was based on information contained in the *SF Guidelines* for employee and visitor trips to the Superdistrict 1. An average vehicle occupancy rate, as obtained from the 2000 U.S. Census data (for residential uses) and *SF Guidelines* (for retail uses) was applied to the number of auto person-trips to determine the number of vehicle-trips generated by the proposed project.

Table 9 summarizes the weekday PM peak hour trip generation by mode for the proposed project. During the weekday PM peak hour, about 38 percent of all person-trips would be by auto, 19 percent by transit, and 43 percent by other modes (including walking). The proposed project would generate about 49 vehicle-trips during the weekday PM peak hour, of which 32 vehicle-trips (65 percent) would be inbound to the project site, and 17 vehicle-trips (35 percent) would be outbound from the project site. Vehicle-trips are calculated by applying the average vehicle occupancy rate to the number of auto person-trips.

TABLE 9
PROPOSED PROJECT TRIP GENERATION BY MODE – WEEKDAY PM PEAK HOUR

Land Use	Person-Trips				Vehicle Trips
	Auto	Transit	Walk/Other[a]	Total	
Residential	49	25	51	125	45
Retail	11	5	16	32	4
Total	**60**	**30**	**67**	**157**	**49**

Source: 2000 U.S. Census, San Francisco Planning Department, LCW Consulting, June 2007.
Note:
a. "Other" mode includes bicycles, motorcycles, and taxis.

TRIP DISTRIBUTION/ASSIGNMENT

The directional distribution of the project-generated trips was derived from the 1990 U.S. Census for the residential uses and from the *SF Guidelines* for the retail uses. The 1990 Census data was used because directional distribution information is not currently available from the 2000 Census. Distributions are based on the origin/destination of the trip, and are separated into the four quadrants of San Francisco (Superdistricts 1 through 4), East Bay, North Bay, South Bay, and outside the region. As shown in Table 10, the majority of the project-generated trips during the weekday PM peak hour would come to and from Superdistrict 1, with smaller percentages to and from Superdistricts 2, 3, 4, and the East Bay and South Bay. These patterns were used as the basis for assigning project-related trips to the local streets in the study area, and the transit trips to the local and regional transit operators.

TABLE 10
TRIP DISTRIBUTION PATTERNS

Origin/Destination	Residential Uses	Retail Uses	
	Work	Work	Visitor
San Francisco			
Superdistrict 1	57.7%	12.8%	19.0%
Superdistrict 2	8.3%	14.4%	7.0%
Superdistrict 3	8.3%	17.0%	8.0%
Superdistrict 4	8.3%	11.2%	3.0%
East Bay	9.0%	22.4%	11.0%
North Bay	1.1%	6.1%	5.0%
South Bay	5.8%	14.3%	8.0%
Outside of Region	1.5%	1.8%	39.0%
Total	**100%**	**100%**	**100%**

Source: 1990 U.S. Census, San Francisco Planning Department, LCW Consulting, June 2007.

TRAFFIC IMPACTS

The proposed project would generate 32 inbound and 17 outbound vehicle-trips during the weekday PM peak hour. Project-generated vehicle trips were assigned to and from the project driveway on Clarence Place.

Table 11 presents the Existing plus Project intersection levels of service for the weekday PM peak hour. In general, the addition of project-generated traffic would result in relatively small changes in the average delay per vehicle at the study intersections, and most study intersections would continue to operate at the same service levels as under existing conditions. It should be noted that at some of the study intersections, the average delay per vehicle would remain constant or slightly decrease with the addition of project-related traffic. Using the *HCM* methodology, the level of service is calculated based on an average of the total vehicular delay per approach, weighted by the number of vehicles at each approach. Increases in traffic volumes at an intersection usually result in increases in the overall intersection delay. However, if there are increases in the number of vehicles at movements with low delays, the average weighted delay per vehicle may remain the same or decrease.

TABLE 11
INTERSECTION LEVEL OF SERVICE
EXISTING PLUS PROJECT CONDITIONS – WEEKDAY PM PEAK HOUR

	Existing		Existing plus Project	
Intersection	**Delay[a]**	**LOS[b]**	**Delay[a]**	**LOS[b]**
1. Second/King	49.9	D	50.0	D
2. Third/King[c]	**67.1**	**E**	**67.8**	**E**
3. Second/Townsend	16.1	B	16.3	B
4. Third/Townsend	22.0	C	22.5	C
5. Second/Brannan	12.9	B	12.9	B
6. Third/Brannan	30.0	C	30.1	C
7. Second/Bryant	44.6	D	44.9	D

Source: LCW Consulting, June 2007.

Notes:

a. Delay presented in seconds per vehicle.

b. Intersections operating at LOS E or F are highlighted in bold.

c. At the intersection of Third/King, under the Existing plus Project condition the v/c ratio would remain at 0.94 (same as under Existing conditions).

Project-generated vehicle trips would travel through one intersection that currently operates at LOS E. As indicated in the Setting, the poor operating conditions at Third and King Streets are

generally due to the high volume of vehicles that are approaching and departing the I-280 ramps on King Street. The proposed project would contribute 11 vehicles to this intersection, with contributions ranging from two to five vehicles at each of the intersection's three critical movements. Compared to the existing traffic levels ranging from 645 to 1,155 vehicles per peak hour through these movements of the intersection, the project would not substantially increase peak hour trips.

Given that the project would not cause a decrease in intersection level of service at any of the study intersection, the proposed project would not result in a significant traffic impact, therefore no mitigation measures are needed.

TRANSIT IMPACTS

As described in Table 9, the proposed project would generate 30 transit trips (19 inbound and 11 outbound) during the weekday PM peak hour. These transit trips to and from the proposed project would utilize the nearby Muni lines and regional transit lines, and may include transfers to other Muni bus and light rail lines, or other regional transit providers. In the immediate vicinity of the proposed project site, the transit lines generally have available capacity during the weekday PM peak hour that could be used to accommodate the inbound and outbound transit trips generated by the proposed project, and the proposed project would not substantially affect transit operations.

Since the local transit system generally has the capacity to accommodate the transit demand generated by the proposed project, no significant impact to transit would occur, and no mitigation measures are required.

PEDESTRIAN IMPACTS

Pedestrian trips generated by the proposed project would include walk trips to and from the residential and retail uses, plus walk trips to and from the local and regional transit operators, and some walk trips to and from nearby parking facilities. Overall, the proposed project would add about 97 pedestrian trips (30 to/from transit and 67 walk/other) to the surrounding streets during the weekday PM peak hour. These pedestrians would enter and exit the proposed project via the entry to the internal courtyard and residential lobby on Townsend Street, and the entry to the residential lobby on Clarence Place. The project-generated pedestrian trips would be dispersed throughout the study area, depending upon the origin and destination of each trip. It is anticipated that a majority of the new pedestrian trips during the weekday PM peak hour would be to and from the commercial uses on King and Townsend Streets west of the project

site, and to and from the light rail stations on King Street and the Caltrain terminal at Fourth/Townsend.

These new pedestrian trips could be accommodated on the existing sidewalks and crosswalks adjacent to the project site and would not substantially affect the current pedestrian conditions along Townsend Street. As sidewalks in the project vicinity are generally between 10 and 15 feet wide, and currently have low to moderate levels of pedestrian activity, pedestrian conditions would remain acceptable.

The project sponsor proposes to provide an eight-foot wide sidewalk on Clarence Place adjacent to the project site. With the proposed sidewalk, pedestrian access to the existing residential and commercial uses to the north of the project site would be enhanced.

Given that the addition of pedestrian and vehicular traffic generated by the proposed project would not substantially affect pedestrian conditions in the vicinity of the proposed project and given that the proposed project includes enhancements to existing pedestrian facilities, the proposed project would not have impacts to pedestrians and no mitigation measures are required.

BICYCLE IMPACTS

The proposed project would supply 33 bicycle parking spaces (in stacked lockers), to be located within the basement level of the parking garage. The *Planning Code* requires the proposed project to provide six bicycle parking spaces. The proposed project would provide 33 bicycle spaces, and it would meet the *Planning Code* requirement.

The project site is within convenient bicycling distance of downtown San Francisco, the Financial District and major transit hubs (Caltrain, Ferry Building, Transbay Terminal). As such, it is anticipated that a portion of the "other" trips generated by the proposed project would be bicycle trips.

As noted in the Setting section, there are several bicycle routes close to the project site, including those along Second Street, Townsend Street, and The Embarcadero. The *2005 Bicycle Plan* proposes implementing bicycle lanes on Townsend and Second Streets. With the current bicycle and traffic volumes on the adjacent streets, bicycle travel generally occurs without major impedances or safety problems. Although the proposed project would result in an increase in the number of vehicles in the vicinity of the project site, this increase would not be expected to affect bicycle travel in the area. Also, since the garage entrance to the proposed project would

be off of Clarence Place, conflicts between project-generated vehicles accessing the site and bicyclists within the proposed bicycle lane would be minimized.

Since the proposed project includes bicycle parking in excess of that which is required by the *Planning Code* and project generated bicycle trips would easily be accommodated by existing bicycle facilities, no impacts to bicycles would occur and no mitigation is required.

PARKING IMPACTS

Parking Demand

The parking demand for the proposed project was determined based on the methodology presented in the *SF Guidelines*. For residential units, the long-term parking demand is based on the number, type (market rate versus affordable units), and size of the units. For retail uses, the long-term demand was derived by estimating the number of employees and applying the trip mode split and average vehicle occupancy from the trip distribution calculations. The short-term parking demand was estimated from the total daily visitor trips by private automobile and an average turnover rate of 5.5 vehicles per space.

Table 12 presents the estimated parking demand for the project. The residential uses would generate a demand for 107 spaces, and the retail uses would generate a parking demand for about seven spaces. The peak residential parking demand would occur primarily overnight, although a portion of the residential demand would also occur during the day. Overall, the proposed project would generate a parking demand for about 114 spaces, of which 109 spaces would be long-term demand and five spaces would be short-term demand.

TABLE 12
PROPOSED PROJECT PARKING DEMAND

Land Use	Long-Term Parking Spaces	Short-Term Parking Spaces	Total
Residential	107	0	107
Retail	2	5	7
Total	**109**	**5**	**114**

Source: SF Guidelines, LCW Consulting, June 2007.

Parking Impacts

The proposed project would supply a one-level, 13,200-gsf, underground parking garage with 72 parking spaces in two-car stacked lockers. All parking spaces would be located within the

basement level parking garage. The parking lifts would be operated by the residents. The parking garage would use an existing entrance into the building on Clarence Place for access into the parking garage which is about 12 feet, 10 inches wide. The existing curb cut on Townsend Street would be eliminated.

The proposed project would request a 60-foot passenger loading/unloading (white) zone adjacent to the arched entry to the courtyard and residential lobby on Townsend Street. Since implementation of this proposed passenger zone would eliminate two on-street parking spaces on the north side of Townsend Street adjacent to the project site, this passenger loading/unloading zone would need to be approved at a public hearing by the Municipal Transportation Agency (MTA).

Since parking is not permitted on the east side of Clarence Place, and given the limited roadway right-of-way (35 feet), the project sponsor would request that three of the six existing parking spaces on the west side of Clarence Place be converted to a 60-foot commercial loading/unloading zone. Since three existing parking spaces would be displaced, this commercial loading/unloading zone would need to be approved at a public hearing by the MTA.

The *Planning Code* requires the proposed project to provide 85 independently-accessible parking spaces (one parking space per unit) and one car-share parking space. Since the proposed project would provide 74 parking spaces with 72 spaces in stackers, it would not meet the *Planning Code* requirement for the number or type of parking spaces. The project sponsor would request a variance to the *Planning Code* requirements. The proposed project would provide one car-share space, which would meet the *Planning Code* requirement.

The proposed project would generate a long-term residential parking demand for about 80 spaces. The long-term residential demand generally occurs during the evening and overnight hours. The long-term parking demand of 107 spaces would not be accommodated within the parking supply of 74 parking spaces, which would result in a shortfall of 33 spaces. This shortfall would be accommodated on-street or in nearby off-street parking facilities that provide overnight parking.

During the weekday midday, the residential parking demand is estimated to be about 80 percent of the overnight parking demand, or about 86 spaces. In addition, there would be a parking demand of seven spaces for the retail uses, creating a total midday demand of 93 spaces. Since the proposed project would provide 74 parking spaces, there would be a shortfall of 19 parking spaces (93-space total demand less the 74-space parking supply) during

the midday period. Since the proposed project would have a shortfall of 19 parking spaces, on-street and off-street parking occupancy in the study area would increase. It is anticipated that a portion of the 33-space overnight parking shortfall would remain parked in off-street facilities during the day. However, the short term parking demand could be accommodated within the on-street supply which is generally restricted to one-hour and two-hour parking limits.

The proposed project would displace an existing public parking facility accommodating about 110 parking spaces. The vehicles currently parking on the project site would be displaced to other off-street facilities in the area, or to on-street parking spaces, and both on-street and off-street parking occupancy would be anticipated to increase.

The garage entrance is anticipated to be gated, with access by remote control garage door opener. Given that the building is a residential use, and many residents would take transit to work as reflected in the mode split data for the census tract, there would not be a peak period for garage access. Therefore, it is not anticipated that any queues of vehicles accessing the garage would extend onto Townsend Street.

The proposed project would result in a midday shortfall of 19 to 40 spaces, eliminate 110 public parking spaces, increase midday off-street parking facility occupancy from 90 to 99 percent and create an overnight shortfall of 33 spaces, and displace four vehicle and three motorcycle on-street parking spaces. In terms of CEQA, these impacts to parking would not be considered significant for the reasons discussed on p. III.C-13 and 14; therefore no mitigation is required. However, Improvement Measure 1: Transportation – Parking (p. IV-5) has been suggested to reduce the overall impacts to parking associated with the proposed project.

LOADING IMPACTS

Loading Demand

The delivery/service vehicle demand is estimated based on the methodology and truck trip generation rates presented in the *SF Guidelines*. Delivery/service vehicle demand is based on the types and amount of land uses.

As shown in Table 13, the proposed project would generate approximately two delivery/service vehicle-trips per day. This corresponds to a demand for less than one loading space during both the average and the peak hour of loading activities. It is anticipated that most of the delivery/service vehicles that would be generated by the proposed project would consist of small trucks and vans. In addition, the residential uses would generate an occasional demand for large and small moving vans.

TABLE 13
PROPOSED PROJECT DELIVERY/SERVICE VEHICLE-TRIPS AND LOADING SPACE DEMAND

Land Use	Daily Truck Trip Generation	Peak Hour Loading Spaces	Average Hour Loading Spaces
Residential	1.9	0.1	0.1
Retail	0.5	0.0	0.0
Total	**2.4**	**0.1**	**0.1**

Source: SF Guidelines, LCW Consulting, June 2007.

LOADING IMPACTS

The proposed project would not provide an off-street loading area. The proposed project would request a 60-foot commercial vehicle loading/unloading zone on the west side of Clarence Place. The proposed commercial loading/unloading zone would eliminate three of the six two-hour parking spaces on Clarence Place. The proposed zone would need to be approved at a public hearing by the MTA.

The *Planning Code* does not require the proposed project to provide any loading spaces for either the residential or retail uses.

The proposed project would generate a demand for about one loading space during both the average and the peak hour of loading activities. Given the limited number of uses served by Clarence Place, it is anticipated that the proposed project's loading demand could be accommodated within the proposed on-street loading zone.

Residential move-in and move-out activities would also occur from the proposed commercial vehicle loading/unloading zone on Clarence Place. The existing on-street spaces on Clarence Place could also be reserved through the local station of the Police Department.

A trash room would be located in the basement level, and would be the primary garbage/recycling area for the proposed project. For garbage/recycling pickup, trash containers would be transported by the trash/recycling service from the trash room to the curb via the garage driveway, and would be returned following pick-up. Garbage storage would not occur on Clarence Place. For garbage/recycling pick-up, trucks would be directed to stop at the curb adjacent to the driveway.

The proposed project would request a 60-foot passenger loading/unloading zone adjacent to the project site on Townsend Street. The proposed zone would eliminate one metered commercial

vehicle loading/unloading space and three motorcycle spaces on-street parking spaces. The proposed passenger zone would need to be approved at a public hearing by the MTA.

Given that the loading demand generated by the proposed project would be accommodated by the proposed loading/unloading zone on Clarence Place, there would be no significant impact with respect to loading and no mitigation is required.

CONSTRUCTION IMPACTS

Information on the construction program for the proposed project was based on information obtained from the project sponsor. It is anticipated that construction of the proposed project would take approximately 16 to 18 months. Detailed plans for construction activities have not yet been finalized; however, there would be three somewhat overlapping construction phases:

- Phase 1 – Interior Demolition and Excavation
- Phase 2 – Foundation and building construction
- Phase 3 – Exterior and Interior finishes

Construction related activities would typically occur Monday through Saturday, between 7:00 AM and 4:00 PM. It is not anticipated that construction activities would occur on Sundays, but may occur on an as-needed basis for a particular phase.

Construction staging would occur primarily within the site, and possibly adjacent to the project site on Clarence Place. Staging on Clarence Place would likely occur within the ten feet immediately adjacent to the existing building (at the south end near Townsend Street), and a vehicular access lane would be maintained at all times. It is anticipated that the sidewalk along the proposed project frontage on Townsend Street would be closed during a portion of the construction duration, and that a temporary pedestrian walkway would be provided. During some construction phases the six on-street parking spaces on the west side of Clarence Street may need to be temporarily displaced to accommodate construction activities and ensure that vehicular access to uses to the north of Clarence Place is maintained.

It is anticipated that no regular traffic lanes would need to be closed during construction. However, if it is determined that temporary traffic lane closures would be needed, they would be coordinated with the City in order to minimize the impacts on local traffic. In general, lane and sidewalk closures are subject to review and approval by the MTA and the Interdepartmental Staff Committee on Traffic and Transportation. Since there are no Muni bus stops along the project site frontage, it is not anticipated that any Muni bus stops would need to be relocated during construction of the proposed project.

Throughout the construction period, there would be a flow of construction-related trucks into and out of the site. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect traffic operations. The number of trucks associated with each construction phase is currently unknown, and will be developed once a construction contractor is retained by the project sponsor.

It is anticipated that a majority of the construction-related truck traffic would use I-80/U.S. 101 and I-280 to access the project site from the East Bay and South Bay. For access between the project site and the East Bay, trucks would be routed to the site from I-80 westbound via Fremont Street off-ramp (to Harrison Street and The Embarcadero to Townsend Street), and would return to I-80 eastbound from Townsend Street (via Second Street) to the Bryant Street on-ramp. For access between the project site and the South Bay, trucks would be routed from I-280 northbound to the site via the King Street off-ramp to Second Street to Townsend Street, and would return to I-280 southbound from Townsend Street to Second Street and the King Street on-ramp.

It is anticipated that there would be between 15 and 80 construction workers per day at the project site, depending on the construction phase. The trip distribution and mode split of construction workers are not known. Construction workers that drive to the site would be able to park on-site for a portion of the construction duration, and would also park at nearby commercial parking facilities. It is anticipated that the addition of the worker-related vehicle- or transit-trips would not substantially affect transportation conditions, as any impacts on local intersections or the transit network would be similar to, or less than, those associated with the proposed project.

Any construction traffic occurring between 7:00 a.m. and 9:00 a.m. or between 3:30 p.m. and 6:00 p.m. would coincide with peak hour traffic and could temporarily impede traffic and transit flow. Although this would not be considered impact, the incorporation of Improvement Measure 2: Transportation – Construction (p. IV-5) would further reduce any impact to traffic associated with construction.

CUMULATIVE ANALYSIS (2025)

Methodology

The San Francisco County Transportation Authority countywide travel demand forecasting model was used to develop the traffic volume forecasts for future year 2025 Cumulative

conditions. This approach results in a cumulative impacts assessment for future conditions that takes into account both the future development expected in vicinity of the proposed project, as well as the expected growth in housing and employment for the remainder of San Francisco and the nine-county Bay Area. The travel demand forecasts were based on the travel demand forecasting effort currently being conducted by the Planning Department for the *Eastern Neighborhoods Rezoning and Community Plan Environmental Impact Report.*

Traffic Impacts

Table 14 presents the 2025 Cumulative intersection operating conditions for the weekday PM peak hour. Overall, four of the seven study intersections would operate at LOS E or LOS F under the 2025 Cumulative conditions, as compared to one intersection under Existing conditions. In general, the poor operating conditions would occur along the access routes to and from the I-280 King Street ramps (at Second/King, Third/King, and Third/Brannan). In addition, the intersection of Second/Bryant would operate at LOS F. Bryant Street provides access to the I-80 eastbound on-ramp at Sterling Place, and both Second and Bryant Streets serve as access routes to the I-80 eastbound on-ramps on Harrison Street at Essex Street and at First Street.

TABLE 14
INTERSECTION LEVEL OF SERVICE
2025 CUMULATIVE CONDITIONS – WEEKDAY PM PEAK HOUR

	Existing		2025 Cumulative		
Intersection	**Delay[a]**	**LOS[b]**	**Delay[a]**	**LOS[b]**	**V/C[c]**
1. Second/King	49.9	D	**>80.0**	**F**	**0.99**
2. Third/King	67.1	E	**>80.0**	**F**	**1.45**
3. Second/Townsend	16.1	B	17.9	B	–
4. Third/Townsend	22.0	C	35.6	D	–
5. Second/Brannan	12.9	B	15.0	B	–
6. Third/Brannan	30.0	C	**>80.0**	**F**	**1.40**
7. Second/Bryant	44.6	D	**61.5**	**E**	**1.11**

Source: LCW Consulting, June 2007.
Notes:
a. Delay presented in seconds per vehicle.
b. Intersections operating at LOS E or LOS F are highlighted in bold.
c. v/c = volume-to-capacity ratio presented for all intersections operating at LOS E or LOS F.

To assess the effect of the vehicle-trips generated by the proposed project on 2025 Cumulative conditions, the contribution of the proposed project to the 2025 Cumulative traffic volumes was determined. Two different percent contributions were calculated: the project-generated traffic

as a percent of total 2025 Cumulative traffic volumes, and the project-generated traffic as a percent of only the increase in traffic volumes between Existing and 2025 Cumulative conditions.

The percent contributions at the seven study intersections are presented in Table 15 and are included in Appendix B. The proposed project would contribute minimally to the total 2025 Cumulative traffic volumes at the study intersections, with total contributions ranging from 0.1 to 1.8 percent. The contribution to the growth in traffic volumes between Existing and 2025 Cumulative conditions would be between 0.2 and 14.1 percent.

TABLE 15
PROJECT'S CONTRIBUTION TO 2025 CUMULATIVE TRAFFIC VOLUMES
PM PEAK HOUR CONDITIONS

Intersection	Existing Volume	Project Volume	2025 Cumulative Volume	Contribution to Total 2025 Cumulative Volume	Contribution To Growth in Volumes
1. Second/King	**2,576**	**3**	**4,585**	**0.1%**	**0.1%**
2. Third/King	**4,259**	**11**	**7,518**	**0.1%**	**0.3%**
3. Second/Townsend	1,371	29	1,577	1.8%	14.1%
4. Third/Townsend	2,736	20	4,071	0.5%	1.5%
5. Second/Brannan	2,012	9	2,196	0.4%	4.9%
6. Third/Brannan	**3,207**	**3**	**4,722**	**0.1%**	**0.2%**
7. Second/Bryant	**3,075**	**9**	**3,396**	**0.3%**	**2.8%**

Source: LCW Consulting, June 2007.
Note: Intersections operating at LOS E or LOS F are highlighted in bold.

Although, as noted above, four of the seven study intersections would operate at LOS E or LOS F under 2025 Cumulative conditions, the proposed project's traffic contributions to these intersections would not be considered significant under cumulative conditions. This was determined based on the examination of the total contribution of project-generated vehicles to the growth in volumes, and also the contribution of project-generated vehicles to the traffic volumes for the traffic movements which determine overall LOS performance. At these intersections, which would operate with adverse cumulative traffic conditions, drivers would generally experience greater delays.

As indicated in Table 15, at the study intersections of Second/King, Third/King, Third/Brannan and Second/Bryant there would be significant cumulative traffic impacts due to anticipated background traffic growth that would cause the LOS at these intersections to deteriorate to LOS E or LOS F. The proposed project's share of future traffic growth at these intersections that

would operate at LOS E or LOS F under 2025 Cumulative conditions would be minor: 0.1 percent at the intersection of Second/King, 0.3 percent at the intersection of Third/King, 0.2 percent at the intersection of Third/Brannan, and 2.8 percent at the intersection of Second/Bryant.

During the PM peak hour, the proposed project would add fewer than 10 vehicles to the four study intersections that would operate at LOS E or LOS F. The proposed project would generally add traffic to movements at each intersection that would continue to operate satisfactorily. In some instances, the proposed project would add vehicles to movements that would operate poorly under Cumulative conditions, however, in these instances, the project's contributions to these movements would be minimal. The deterioration of traffic conditions occurring on freeway access routes is attributable to regional growth.

Therefore, the proposed project's traffic would not represent a cumulatively considerable contribution to the adverse cumulative conditions at the intersections of Second/King, Third/King, Third/Brannan and Second/Bryant, and the proposed project would not have a significant traffic impact.

IV. MITIGATION AND IMPROVEMENT MEASURES

In the course of project planning and design, measures have been identified that would reduce or eliminate potentially significant environmental impacts of the project. The EIR did not identify any mitigation measures because there were no significant impacts that could be reduced by mitigation measures. Mitigation measures identified in the Initial Study would be required by decision makers as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record. Improvement measures are suggested to reduce adverse environmental effects not otherwise identified as significant environmental impacts.

Each mitigation measure from the Initial Study and improvement measure from the EIR is listed below.

MITIGATION MEASURE 1: ARCHAEOLOGICAL RESOURCES

Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The Project Sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall implement the ARD/TP.[42] The consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archaeological Testing and Evaluation Plan. Analysis of subsurface conditions factors related to the structural integrity of the extant building determined that archaeological test trenches shall

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[42] Archeo-Tec, *Archaeological Research Design/Treatment Plan: 178 Townsend Street Project.* Prepared for EIP Associates, June 2006. This report is available for review by appointment at the Planning Department, 1650 Mission Street, 4th Floor in Case File No. 2005.0470E.

not be employed. Rather, archaeological monitoring, and data recovery if warranted, will suffice to mitigate impacts to potentially significant archaeological features should they exist within the project area.

An Archaeological Research Design and Treatment Plan (ARD/TP) has been prepared by the Project Sponsor in consultation with the ERO, subject to review and approval of the ERO. The conclusions/recommendations described in the ARD/TP are as follows:

1. A qualified archaeologist monitor any and all demolition-related excavation in archaeologically sensitive areas, and be authorized to collect samples of and document any cultural resources encountered during demolition-related excavation
2. Archaeological monitoring and concomitant data recovery (should resources of potential significance be identified) be implemented to the fullest extent possible during project construction in order to identify and mitigate adverse impacts to archaeological resources.

Archaeological Monitoring Program. Due to the extensive layers of concrete and rubble encountered within the project area during the geotechnical studies documented by Treadwell and Rollo (2002), an archaeological monitoring program shall be implemented, rather than the test trenching that would normally be conducted. The archaeological monitoring program shall minimally include the following provisions included in the Archaeological Monitoring Plan designed for the project site:

- The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential logical resources and to their depositional context;
- The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;

- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program. The archaeological data recovery program shall be conducted in accordance with the archaeological data recovery plan (ADRP) developed in the ARD/TP. The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation. The ADRP identifies how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP identifies what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The ARD/TP contains both a general Archaeological Data Recovery Plan and specific data recovery approaches for prehistoric and historic period cultural deposits; however, should a previously unanticipated cultural resource be identified during the course of archaeological research within the project site that is not treated in the ARD/TP, a brief, focused Archaeological Data Recovery Plan shall be prepared in consultation with the ERO to treat any such resource(s).

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing

activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, Project Sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archaeological Resources Report. The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California logical Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

MITIGATION MEASURE 2: CONSTRUCTION AIR QUALITY

The Project Sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the Project Sponsor shall require the

contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose. The Project Sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and to implement specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

IMPROVEMENT MEASURE 1: TRANSPORTATION – PARKING

The proposed project would result in a midday shortfall of 19 to 40 spaces, eliminate 110 public parking spaces, increase midday off-street parking facility occupancy from 90 to 99 percent and create an overnight shortfall of 33 spaces, and displace four vehicle and three motorcycle on-street parking spaces. In order to reduce the proposed project's parking demand and shortfall and to encourage the use of alternative modes of transportation the following improvement measures are suggested.

- The project sponsor should include, as part of the move-in packet, a transportation insert. This insert would include information on transit service (Muni and BART lines, schedules and fares), information on where FastPasses may be purchased, information on nearby car share parking space locations, and information on the 511 Regional Rideshare Program.
- The project sponsor should "unbundle" the sale of parking spaces from the sale of residential units to provide a financial incentive for car-free living.

IMPROVEMENT MEASURE 2: TRANSPORTATION – CONSTRUCTION

Any construction traffic occurring between 7:00 a.m. and 9:00 a.m. or between 3:30 p.m. and 6:00 p.m. would coincide with peak hour traffic and could temporarily impede traffic flow. Truck movements should be limited to between the hours of 9:00 a.m. and 3:30 p.m. (or other hours as approved by the Department of Parking and Traffic), in order to minimize disruption of the general traffic flow on adjacent streets during the AM and PM peak period.

The project sponsor and construction contractor(s) would meet with the Agency, the Traffic Engineering Division of the MTA, the Fire Department, Muni, the Planning Department and other City agencies to determine feasible measures to reduce traffic congestion. Prior to construction, the project contractor would coordinate with Muni's Street Operations and Special Events Office to coordinate construction activities and reduce any impacts to transit vehicles.

V. OTHER CEQA ISSUES

This chapter discusses other CEQA-required topics, including growth-inducing impacts, greenhouse gas emissions, significant and unavoidable environmental effects of the proposed project, and areas of controversy and issues to be resolved.

A. GROWTH INDUCEMENT

Growth inducement analyses under CEQA considers the ways in which proposed projects could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.[43] Projects that are traditionally or most commonly considered growth inducing are those that would remove obstacles to population growth (for example, a major expansion of a wastewater treatment plant may allow for more construction in its service area, or a new freeway may allow growth at freeway exits).

Growth in the area is an inherent impact of the proposed project. The basic premise of the project is to alter the land use, density, and character of the project site by providing residential and employment opportunities. If successfully implemented, the proposed project would be expected to create additional population, employment, and housing growth in the project area. The potential impacts associated with this growth are analyzed in the Initial Study and EIR for the proposed project.

This discussion considers how approval of the proposed project could potentially affect growth elsewhere in San Francisco. The proposed project would replace an existing valet parking garage with three valet attendants. Employment at the site would not be expected to increase under the proposed project even with implementation of the optional retail uses, as this use would introduce approximately three new employees, effectively replacing the existing three employees currently at the site. Therefore, the proposed project would not cause substantial growth or concentration in employment that would result in significant growth-inducing impacts related to employment.

The proposed project would provide up to 71,500 gsf of residential space with a maximum of 85 units, 75 of which would be market rate and 10 would be below market rate housing. With anticipated new housing construction, the proposed project would increase the City's overall housing stock. However, implementation of the proposed project would not represent a significant growth in housing in the context of the City as a whole.

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[43] CEQA Guidelines, Section 15126.2(d).

The proposed project is located in an urban area that is already serviced by the City's municipal infrastructure and public services. No expansion to municipal infrastructure or public services not already under construction or included with the project would be required to accommodate new development directly or indirectly induced by the proposed project. The proposed project would not result in development of new public services that would accommodate significant further growth. For these reasons, the project would not be considered to result in significant growth-inducing impacts.

B. "GREENHOUSE GAS" EMISSIONS

Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs). GHGs emitted by human activity are implicated in global climate change, commonly referred to as "global warming." It is presumed that GHGs contribute to an increase in the temperature of the earth's atmosphere by preventing the escape of heat. The principal GHGs are carbon dioxide, methane, nitrous oxide, and water vapor. (Ozone—not directly emitted, but formed from other gases—in the troposphere, the lowest level of the earth's atmosphere, also contributes to retention of heat.) Of these gases, carbon dioxide and methane are emitted in the greatest quantities from human activities. Emissions of carbon dioxide are largely byproducts of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills, and nitrous oxide is emitted primarily from agricultural activities.[44] There is international scientific consensus that human-caused increases in GHGs has and will continue to contribute to global warming, although there is uncertainty concerning the magnitude and rate of the warming. Some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years.[45] Secondary effects are likely to include global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

The California Energy Commission (CEC) estimates that, in 2004, California produced 500 million gross metric tons (about 550 million U.S. tons) of carbon dioxide-equivalent GHG

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[44] Other GHGs, with much greater heat-absorption potential than carbon dioxide, include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

[45] California Air Resources Board (ARB), 2006a. Climate Change website (http://www.arb.ca.gov/cc/120106workshop/intropres12106.pdf) accessed March 24, 2007.

emissions.[46] The CEC found that transportation is the source of 38 percent of California's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 23 percent and industrial sources at 13 percent.[47] In the Bay Area, transportation accounts for just over half of the Bay Area's 85 million tons of GHG emissions. Industrial and commercial uses generate about one-fourth of total GHG emissions, while domestic sources (e.g., home water heaters, furnaces, etc.) account for about 11 percent; power plants, 7 percent; and refineries, 6 percent.[48] California Assembly Bill 32 (AB 32), the Global Warming Solutions Act of 2006, was enacted in 2006 and requires the California Air Resources Board (CARB) to establish a statewide GHG emission cap for 2020 based on 1990 emission levels. Although CARB has not yet adopted the target-year (1990) GHG emissions level, the CEC estimates GHG emissions for 1990 at approximately 433 million gross metric tons (477 million U.S. tons), meaning that to reach the AB 32 goals, California would have to reduce GHG emissions by approximately 13 percent from 2004 levels, by 2020.

In response to AB 32's direction that the CARB identify a list of "discrete early action greenhouse gas reduction measures," in June 2007 CARB adopted three measures and identified 33 additional measures.[49] The three adopted measures, to take effect in 2010, are a low-carbon fuel standard, reduction of refrigerant losses from motor vehicle air conditioning system maintenance, and increased methane capture from landfills. A second group of 23 measures on which work is under way, or will be under way by 2009, relate to agriculture, commercial uses, education uses, energy efficiency, fire suppression, forestry, oil and gas, and transportation. Finally, the CARB is initiating work on 10 conventional air pollution controls aimed at criteria and toxic air pollutants, but with concurrent climate co-benefits. These include under CARB's Diesel Risk Reduction Plan, as well as strategies expected to provide GHG cobenefits by reducing conventional pollutants.

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46 Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption potential.

47 California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 - Final Staff Report, publication # CEC-600-2006-013-SF, December 22, 2006; and January 23, 2007 update to that report. Available on the internet at: http://www.arb.ca.gov/cc/ccei/emsinv/emsinv.htm accessed on September 17, 2007.

48 BAAQMD, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2002, November 2006. Available on the internet at: http://www.baaqmd.gov/pln/ghg_emission_inventory.pdf accessed on September 17, 2007.

49 California Air Resources Board, Proposed Early Actions to Mitigate Climate Change in California, April 20, 2007.

Implementation of the proposed project would contribute to long-term increases in GHGs as a result of traffic increases (mobile sources) and building heating (area sources), and would contribute indirectly to GHG increases through electricity generation. Direct project emissions of carbon dioxide, the primary greenhouse gas that would be emitted, would be an estimated 460 tons per year from mobile sources (vehicular travel) and 196 tons per year from area sources (almost entirely natural gas combustion for heating, assuming a conventional gas-fired system), for a total of 656 tons per year,[50] or approximately 0.01 percent of total San Francisco GHG emissions for the year 2002.[51] The project's incremental increases in GHG emissions associated with traffic increases and space heating would contribute to regional and global increases in GHG emissions and associated climate change effects. Neither the BAAQMD nor any other agency has adopted significance criteria or methodologies for estimating a project's contribution of GHGs or evaluating its significance. However, it is assumed at this point that no individual development project, such as the proposed project, could by itself generate sufficient emissions of GHGs to result in a significant impact in the context of the cumulative effects of GHG emissions. Moreover, as the project would be developed in an urban area with good transit access, the project's transportation-related GHG emissions would tend to be lower than those produced by the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available than in the central city of San Francisco. As new construction, the residential portion of the proposed project would also be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, helping to reduce future energy demand as well as moderate the project's contribution to cumulative regional GHG emissions. Therefore, project would not result in significant impacts related to GHG emissions.

C. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21100 (b)(2)(A) of CEQA, and Section 15126.2(b) of the State *CEQA Guidelines*, this section identifies significant impacts that could not be eliminated or reduced to an insignificant level by implementation of mitigation measures included as part of the project or by other mitigation measures that could be implemented, identified in Section IV, Mitigation Measures and Improvement Measures. This section is subject to final determination by the San

[50] Estimate based on URBEMIS 2007 model, and does not subtract emissions from existing uses on the project site.

[51] Existing GHG emissions from BAAQMD, "Source Inventory of Bay Area Greenhouse Gas Emissions," Nov. 2006.

Francisco Planning Commission as part of the certification process for the EIR. If necessary, this section will be revised in the Final EIR to reflect the findings of the Commission.

The proposed project would redevelop the project site into a residential use with a small amount of potential ground floor retail. As a result, the proposed project would preclude a future PDR use of the site, thereby incrementally reducing the supply of land suitable for PDR development in Eastern Neighborhoods rezoning study area. Although the proposed project would not eliminate an existing PDR use, the project site was historically used for industrial activity and PDR use would be allowable under the zoning. Therefore, development of the proposed project would eliminate an opportunity for PDR use and incrementally reduce the supply of land available for PDR activities.

The proposed project, with mitigation measures, would have the following unavoidable significant cumulative land use effect. Construction of market-rate housing and retail use on the site, as proposed, would contribute to a greater deficit in PDR space and jobs than would otherwise occur under existing zoning. The proposed project could contribute to a greater deficit in PDR space than would otherwise occur without the project, thereby contributing to greater displacement of PDR businesses and jobs than would otherwise occur under existing zoning. For purposes of this EIR, this loss of opportunity for PDR use on the project site and the potential associated displacement of PDR businesses and jobs would be considered a significant, unavoidable cumulative effect of the proposed project, which, by definition, would develop the project site in a manner that would preclude the possibility of PDR use in the future.

No mitigation has been identified for the proposed project's contribution to the cumulative loss of land available for PDR use in the Eastern Neighborhoods rezoning study area. Alternatives to the proposed project are discussed in Chapter VI of this DEIR. Implementation of Alternative B: Mixed-Use PDR or Alternative C: PDR-Only, as well as the No Project alternative, would avoid the potential for the proposed project to contribute to the cumulatively significant effect.

D. CALTRAIN DOWNTOWN EXTENSION

The project site is located adjacent to the proposed future alignment of the Caltrain extension from its existing terminus at the 4th and King Street depot to the Transbay Terminal, located in the vicinity of First Street and Mission Street. The extension would take the form of a tunnel that would be located along Townsend Street and would curve to the north just east of the project site to traverse underneath Second Street toward the terminal. Construction of the

extension in the vicinity of the project site would be completed by means of a mined tunnel, located approximately 25 feet below the existing grade of the project site at its uppermost point.

Together with the Federal Transit Administration, the Peninsula Corridor Joint Powers Board, and the San Francisco Redevelopment Agency, the Planning Department completed an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the proposed extension, Transbay Terminal, and redevelopment project.[52] This document describes the potentially significant effect of the proposed infrastructure construction, including potential effects on the building at 166-178 Townsend Street. Potential impacts on the property would include construction- and operation-related noise, vibration, and geologic impacts, for which mitigation measures are identified in the EIS/EIR. The EIS/EIR notes that a construction easement for the portion of the proposed tunnel fronting on the project site may be required, but that the proposed extension would not have a historic resources impact on the existing building on the site, as demolition of the building would not occur under any of the alternatives. The proposed project at 166-178 Townsend Street would not contribute considerably to increased traffic congestion at intersections, including intersections affected by the Caltrain extension project, as discussed in Section III.C of this EIR.

E. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This Draft EIR assess the proposed project's contribution to cumulatively significant land use changes in the Eastern Neighborhoods and the ability of the City to 1) meet its future PDR space needs and 2) achieve its housing goals as expressed in the *General Plan*. It also evaluates the potential impacts of the proposed project with respect to historic resources and traffic and circulation. The Initial Study prepared for the project (Appendix A) found that all other environmental effects would be less than significant, with mitigation measures identified for archaeological resources and construction air quality impacts.

On January 27, 2007, the Planning Department issued a "Notice of Preparation of an Environmental Impact Report." Individuals and agencies that received these notices included owners of properties within 300 feet of the project site, tenants of properties adjacent to the project site, and other potentially interested parties, including various regional and state

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[52] US Department of Transportation Federal Transit Administration et. al., Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Final Environmental Impact Statement/Environmental Impact Report and Section 4(f) Evaluation, March 2004. This document can be reviewed by request at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2000.048E.

agencies. Comments on the NOP/IS requested that access along Clarence Place to the property at the rear of the project site be maintained, and that impacts from construction be minimized.

With the publication of the Draft EIR, there will be another public comment period on the adequacy and accuracy of the environmental analysis that will last from December 22, 2007, to January 25, 2008, and will include a public hearing before the Planning Commission scheduled for January 31, 2008. Following the Planning Department's publication and distribution of the written responses to all comments received on the Draft EIR, the EIR will go before the Planning Commission for certification. After the EIR certification, the Planning Commission (or the Board of Supervisors on appeal) will consider approval of the proposed project.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

As stated in Section 15126.6 (a) of the *CEQA Guidelines*, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

This section identifies potentially feasible alternatives to the proposed project and discusses potential environmental impacts associated with these alternatives. Project decision makers could approve an alternative instead of the proposed project, if that alternative would substantially reduce or eliminate significant impacts of the project and is determined feasible. The determination of feasibility will be made by project decision makers on the basis of substantial evidence in the record, which shall include, but not be limited to, information presented in the EIR and in comments received on the Draft EIR.

Three alternatives are evaluated in this section: Alternative A: No Project; Alternative B: Mixed-Use PDR; and Alternative C: PDR-Only. Alternatives B and C were formulated to respond to the potential cumulative land use impacts of the proposed project. Any of the alternatives could be implemented under City controls but would require many of the same approvals as the proposed project.

No alternative sites have been identified within San Francisco where the project could be constructed and meet the project sponsors' objectives, and where the project's environmental effects would be substantially lessened or avoided. Therefore, an off-site alternative is not considered.

A. ALTERNATIVE A: NO PROJECT

DESCRIPTION

The No Project Alternative would entail no physical land use changes at the project site. The California Electric Light Company Station B building would not be converted, no restoration work would be completed, and no new residential, retail, or open space would be developed. This alternative would not preclude future proposals for redevelopment of the project site, including similar development envisioned in the *Draft East SoMa Area Plan*.

IMPACTS

If the No Project Alternative were implemented, none of the impacts or benefits associated with the proposed project would occur. The existing California Electric Light Company Station B building would not be converted, and the existing commercial parking uses would be retained on site.

The environmental characteristics of this alternative would generally be as described in the environmental setting sections of Section III. Land uses, urban design, visual quality, circulation, parking, and other physical characteristics of the site would not immediately change, except as a result of nearby development. Population, housing, and employment characteristics at the existing site could change under this alternative, as a result of market forces and implementation of the *Draft East SoMa Area Plan.* This alternative would be inconsistent with key goals of the *Draft East SoMa Area Plan*; this Plan focuses on the creation of a mix of land uses including neighborhood serving businesses and mixed residential areas within the eastern SoMa neighborhood.

B. ALTERNATIVE B: MIXED-USE PDR

DESCRIPTION

The Mixed-Use PDR Alternative is intended to respond to the loss of potential PDR space impacts of the proposed project. Under this alternative, the project site would be developed in a manner similar to the proposed project (described in Section II, Project Description), except the ground floor would be primarily occupied by PDR uses (slightly less than the 22,000 square-foot footprint due to accessory uses). The following notable differences would also apply:

- The residential component would be reduced to about 66 units, compared to the proposed project which would have up to 85 units.
- A residential-compatible PDR component would be included on the ground floor. This area would be expected to have an approximately 17,000 square-foot footprint due to accessory uses such as entrances, stairways and mechanical areas.
- As with the proposed project, the California Electric Light Company Station B building would remain and the new development would be built within the existing structure.
- The basic architectural design and locations of support facilities (stairways, elevators, entrances) would mostly remain the same, with the exception of some of the openings along the Clarence Place façade that are included as proposed entrances to ground floor residential units in the proposed project.
- There would be no retail component included.

- The parking garage provided on site would remain the same as under the proposed project.

IMPACTS

The Mixed-Use PDR Alternative would be consistent with the goals of the *Draft East SoMa Area Plan*. This alternative would have characteristics similar to those of the proposed project, and its potential environmental effects—except as noted below—would be similar to those described for the proposed project in Section III, Environmental Setting and Impacts, and the Initial Study, Appendix A. Mitigation and improvement measures described in Section IV would also apply to this alternative. Differences between the proposed project and this alternative, with respect to effects on historic resources, cumulative land use, and transportation, are discussed below.

Cumulative Land Use

The Mixed-Use Alternative would result in the development of 17,000 square feet of PDR space within the footprint of the building, with the remaining space in the 22,000 square foot building footprint occupied by access points and accessory uses on the ground floor. Because this alternative would realize opportunities for PDR uses on site, this alternative would not contribute to a significant cumulative land use effect. However, this alternative would involve a 23 percent reduction in the number of residential units that could be developed on the site, thereby decreasing the project's contribution to the City's housing supply.

Historic Resources

Similar to the proposed project, under the Mixed-Use Alternative, a new five-story, mixed-use building would be constructed within the existing California Electric Light Company Station B building. The building that would be constructed under the Mixed-Use Alternative would result in similar modifications to the existing building, including removal of the roof, trusses, and modifications to the façade for access points and windows. There may be some slight differences in placement and number of openings that would be required at the ground level, but implementation of the alternative would still result in restoration of the façade and modifications to the existing structure. This alternative would have a similar effect on the property as a contributor to the South End Historic District, and would therefore result in less-than-significant impacts to historic resources.

Transportation

In general, light industrial uses generate fewer person trips per square foot than residential uses. Therefore, with the Mixed-Use PDR Alternative, the conversion of approximately 17,000 square feet of residential uses to PDR uses and reduction in the number of residential units on the site would result in a trip generation at the project site that would be approximately equal to or less than the trips proposed under the proposed project. As discussed in Section III, Environmental Setting and Impacts, the proposed project would not result in significant traffic or transit impacts. Therefore, the Mixed-Use PDR Alternative would also not be expected to result in significant traffic or transit impacts.

Under this alternative, the parking garage would remain the same as proposed, and would include 72 parking spaces with two ADA accessible spaces. The Mixed-Use PDR Alternative would require one space per 1,500 square feet of manufacturing or industrial space as required under the *Planning Code*. At 22,000 square feet, the PDR component would require 15 parking spaces compared to the 19 parking spaces required for the ground-floor residential uses under the proposed project. Therefore, there would be a reduced parking requirement for this alternative under *Planning Code* requirements. However, as with the proposed project, the 74 spaces that would be provided in the parking garage would not accommodate the parking demand for this alternative, and a variance would be required. Under this alternative, one off-street freight loading space would also be required by the *Planning Code*.

This alternative would not meet the project sponsor's objective of converting Station B to the desired mix of residential and retail uses.

C. ALTERNATIVE C: PDR-ONLY

DESCRIPTION

The PDR-Only Alternative would involve conversion of the existing 22,000 sq. ft. California Electric Light Company Station B building to a PDR use. The PDR-Only Alternative would not include any residential or retail uses. Under this alternative, the five-story building would not be constructed and there would be minimal structural changes to the existing building. Construction activities would be expected to consist of interior modifications and renovations to accommodate the new uses. The below-grade parking garage included in the proposed project would not be constructed, due to the prohibitive cost and the reduced onsite parking requirement for this use under the *Planning Code*, and no parking would be provided on the site. It should also be noted that because of the economic costs associated with historic

renovation, this alternative would not be expected to complete the proposed renovations to the historic structure.

IMPACTS

The PDR-Only Alternative would retain the existing structure at the site, with minimal structural changes. The environmental characteristics of this alternative would generally be as described in the environmental setting sections of Section III and the Initial Study. Visual quality, urban design, circulation, parking, and other physical characteristics of the site would not immediately change as a result of the alternative, but could continue to change in the area as a result of nearby development. Population and employment characteristics at the project site would change under this alternative, as a result of a land use change from a valet parking garage to a PDR use. This alternative would be inconsistent with key goals of the *Draft East SoMa Area Plan*; this Plan focuses on the creation of a mix of land uses, including neighborhood serving businesses and mixed residential areas, within the eastern SoMa neighborhood.

Cumulative Land Use

Because the project would allow for PDR uses throughout the entire existing floor space at the project site and would not construct a structure that could restrict PDR development and expansion at the site, the PDR-Only Alternative would not result in a reduction in opportunities for PDR use within the City. The PDR-Only Alternative would result in the development of 22,000 square feet of PDR space within the footprint of the building and would not contribute to a significant cumulative land use effect. This alternative would add no housing on the project site and would not contribute to the City's efforts to meet its housing goals.

Historic Resources

This alternative would not result in any substantial modifications to the existing historic structure; therefore, there would not be any significant impacts to historic resources.

Transportation

Like the Mixed-Use PDR Alternative, the PDR-Only Alternative would be expected to result in reduced trip generation at the project site compared to the proposed project. As discussed in Section III, Environmental Setting and Impacts, the proposed project would not result in significant traffic or transit impacts. Therefore, the Mixed-Use PDR Alternative would also not be expected to result in significant traffic or transit impacts.

The PDR-Only Alternative would require one parking space per 1,500 square feet of manufacturing or industrial space under the *Planning Code*. At 22,000 square feet, the PDR component would require about 15 parking spaces. Under this alternative, however, the proposed below ground parking garage would not be constructed, and therefore, there would not be any off-street parking provided at the project site. Under this alternative, one off-street freight loading space would also be required by the *Planning Code*.

This alternative would not meet the project sponsor's objective of converting Station B to the desired mix of residential and retail uses.

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Both Section III, Environmental Setting and Impacts, and the Initial Study, Appendix A, prepared for the proposed project, determined that impacts in the following issue areas would be less than significant or less than significant with mitigation: aesthetics, cultural resources, transportation and circulation, noise, air quality, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards/hazardous materials, mineral/energy resources, and agricultural resources. Impacts in those issue areas would also be less than significant with implementation of the Mixed-Use PDR or PDR-Only Alternatives, because the alternatives would also be contained within the envelope of the existing structure and would result in the same or reduced population or employment activity at the project site. Therefore, both of these alternatives would eliminate the potentially significant unavoidable cumulative land use effects of the proposed project identified in this EIR. However, in contrast to the Mixed-Use PDR alternative, the PDR-Only alternative would also eliminate the potential less-than-significant impacts to historical and archaeological resources that would result from implementation of either the proposed project or the Mixed-Use PDR alternative. Based on this preliminary analysis, the environmentally superior alternative would be the PDR-Only Alternative.

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NEARBY PROPERTY OWNERS

Approximately 600 property owners and occupants in the project vicinity were sent Notices of Availability of the Draft EIR. A complete list of names and addresses is available by appointment.

APPENDIX A: INITIAL STUDY

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RE: CASE NO. 2005.0470E: 178 TOWNSEND STREET
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

A Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project, described below, has been issued by the Planning Department. An Initial Study has also been prepared to provide more detailed information regarding the proposed project and the environmental issues to be considered in the draft EIR. The NOP/Initial Study is either attached or is available upon request from **Sarah Jones**, whom you may reach at **(415) 558-5976** or at the above address. It is also available online at: **http://www.sfplanning.org**. This notice is being sent to you because you have been identified as potentially having an interest in the project or the project area.

Project Description: The project site is at 178 Townsend Street, on the corner of Townsend Street and Clarence Place between Second Street and Third Street (Assessor's Block 3788, Lot 012). The site is zoned SLI (Service/Light Industrial), is in a 50-X Height and Bulk District, and is occupied by the California Electric Light Company Station B building, a Contributory Building within the South End Historic District. The Project Sponsor proposes to preserve and convert the building from its current use as a valet parking garage to a mix of ground-floor retail and up to 85 housing units, with accessory off-street parking for the residential uses. The existing corrugated steel roof, which has been determined to be non-historic, would be removed to accommodate the project. The proposed uses would be housed in an approximately five-story building totaling approximately 86,000 gross square feet (gsf), with 62,000 gsf in residential uses and 2,350 gsf in retail uses. The proposed structures would be contained within the walls of the existing structure and would be set back 40 feet from Townsend Street. They would rise above the existing 23- to 42-foot tall roofline to a height of 50 feet. The ground-floor level would include a publicly-accessible courtyard located immediately behind the walls of the Townsend Street façade and lined with two small retail spaces. A one-level, 13,200-gsf, underground parking garage with 74 parking spaces in two-car stackers, accessed from Clarence Place, would be provided for use by residents. The project would require a Conditional Use authorization, variance approval, and a Certificate of Appropriateness for alterations to a Contributory Building within the South End Historic District.

As stated in the NOP, the Planning Department has determined that an EIR must be prepared for the proposed project prior to any final decision regarding whether to approve the project. The purpose of the EIR is to provide information about potential significant physical environmental effects of the proposed project, to identify possible ways to minimize the significant effects, and to describe and analyze possible alternatives to the proposed project. Preparation of an NOP or EIR does not indicate a decision by the City to approve or disapprove the project. However, prior to making any such decision, the decision makers must review and consider the information contained in the EIR.

Written comments on the scope of the EIR are welcome. Please submit comments by the close of business on February 26, 2007. Written comments should be sent to Paul Maltzer, Environmental Review Officer, San Francisco Planning Department, 1660 Mission Street, Suite 500, San Francisco, CA, 94103.

If you work for an agency that is a Responsible or Trustee Agency, we need to know the view of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit of other approval for this project. We will also need the name of the contact person for your agency.

If you have questions concerning the environmental review of the proposed project, please contact Sarah Jones at **(415) 558-5976.**

PLANNING DEPARTMENT

City and County of San Francisco • 1660 Mission Street, Suite 500 • San Francisco, California • 94103-2414

MAIN NUMBER	DIRECTOR'S OFFICE	ZONING ADMINISTRATOR	PLANNING INFORMATION	COMMISSION CALENDAR
(415) 558-6378	PHONE: 558-6411	PHONE: 558-6350	PHONE: 558-6377	INFO: 558-6422
	4TH FLOOR FAX: 558-6426	5TH FLOOR FAX: 558-6409	MAJOR ENVIRONMENTAL FAX: 558-5991	INTERNET WEB SITE WWW.SFGOV.ORG/PLANNING

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date of this Notice: January 27, 2007

Lead Agency: Planning Department, City and County of San Francisco
1660 Mission Street, 5th Floor, San Francisco, CA 94103

Agency Contact Person: Sarah Jones **Telephone:** (415) 558-5976

Project Title: 2005.0470E: 178 Townsend Street Project
Project Sponsors: Martin Building Company
Project Contact Person: Michael Yarne, Martin Building Co. **Telephone:** (415) 348-4620

Project Address: 178 Townsend Street, between Second Street and Third Street
Assessor's Block(s) and Lot(s): Block 3788, Lot 012
City and County: San Francisco

Project Description: The project site is at 178 Townsend Street, on the corner of Townsend Street and Clarence Place between Second Street and Third Street (Assessor's Block 3788, Lot 012). The site is zoned SLI (Service/Light Industrial), is in a 50-X Height and Bulk District, and is occupied by the California Electric Light Company Station B building, a Contributory Building within the South End Historic District. The Project Sponsor proposes to preserve and convert the building from its current use as a valet parking garage to a mix of ground-floor retail and up to 85 housing units, with accessory off-street parking for the residential uses. The existing corrugated steel roof, which has been determined to be non-historic, would be removed to accommodate the project. The proposed uses would be housed in an approximately five-story building totaling approximately 86,000 gross square feet (gsf), with 62,000 gsf in residential uses and 2,350 gsf in retail uses as well as parking space, open space, common area, and building service space. The proposed structure would be contained within the walls of the existing structure and would be set back 40 feet from Townsend Street. The new building would rise above the existing 23- to 42-foot tall roofline to a height of 50 feet. The ground-floor level would include a publicly-accessible courtyard located immediately behind the walls of the Townsend Street façade and lined with two small retail spaces. A one-level, 13,200-gsf, underground parking garage with 74 parking spaces in two-car stackers, accessed from Clarence Place, would be provided for use by residents. The project would require a Conditional Use authorization, variance approval, and a Certificate of Appropriateness for alterations to a Contributory Building within the South End Historic District.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the reasons as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on February 26, 2007. Written comments should be sent to Paul Maltzer, San Francisco Planning Department, 1660 Mission Street, Ste. 500, San Francisco, CA 94103.

State Agencies: We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

1/23/07
Date

Paul E. Maltzer, Environmental Review Officer

INITIAL STUDY

2005.0470E: 178 Townsend Street Project

A. PROJECT DESCRIPTION

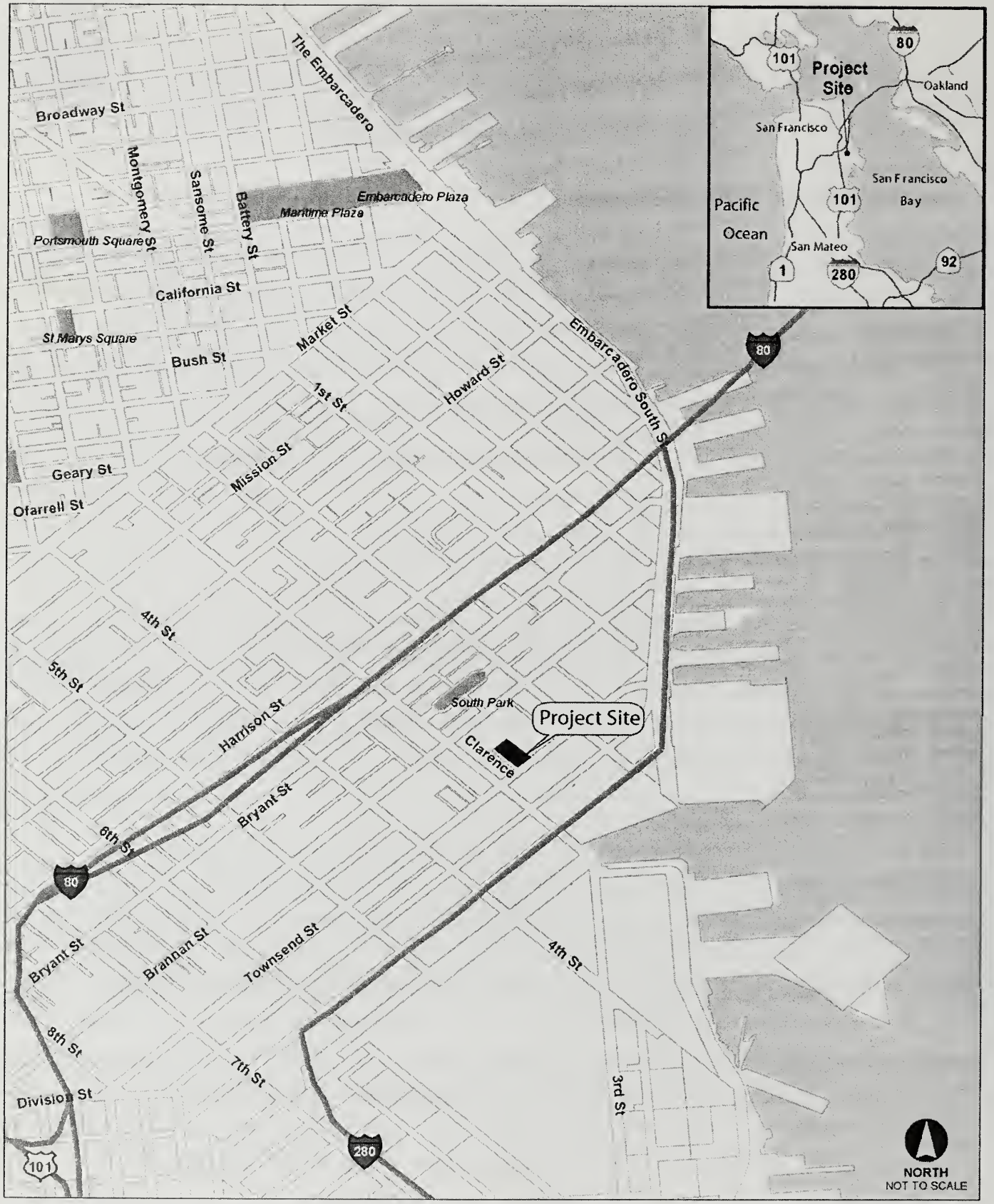
The project site is at 178 Townsend Street on the northeast side of Clarence Place, in the South Park area of the South of Market (SoMa) neighborhood (see Figure 1). The project site is on Assessor's Block 3788, Lot 012, which has an approximate area of 22,000 square feet (sf), or about 0.5 acres. The project site is within an SLI (Service/Light Industrial) District and a 50-X Height and Bulk District. Figure 2 shows the project site plan and surrounding area.

The project site is occupied by the California Electric Light Company Station B building, a single-story reinforced brick structure that originally housed generating equipment and is currently used as a commercial valet parking garage with a capacity for approximately 110 cars. The main entrance to the site is on Townsend Street, with an additional access point on Clarence Place.

Martin Building Company (Project Sponsor) proposes to rehabilitate and convert the California Electric Light Company Station B building and develop ground-floor retail uses and up to 85 housing units, with accessory off-street parking for the residential uses. Twelve percent of the total number of dwelling units would be designated as Below Market Rate (BMR) units as required by the City's Inclusionary Affordable Housing Program, set forth in Section 315 of the *San Francisco Planning Code (Planning Code)*.[1]

The California Electric Light Company Station B building is a Contributory Building within the South End Historic District, as established in the *Planning Code* Article 10, Appendix I. Built in 1888, the original multi-story structure was partially destroyed by the 1906 earthquake and fire, then rebuilt in its current configuration as a single-story brick warehouse divided into two sections, with a pitched roof and stepped parapets along the front roofline. The front portion of the building occupies the lot to a depth of approximately 150 feet measured from the Townsend Street façade, and is enclosed by walls 20 feet in height along Clarence Place and the eastern property line, and a stepped parapet peaking at about 35 feet at the front façade on Townsend Street. The rear portion of the building is enclosed by 35-foot-high brick walls running along Clarence Place and the eastern property line, and two stepped parapets peaking at slightly below 50 feet in height in the middle of the building and at the rear building façade.

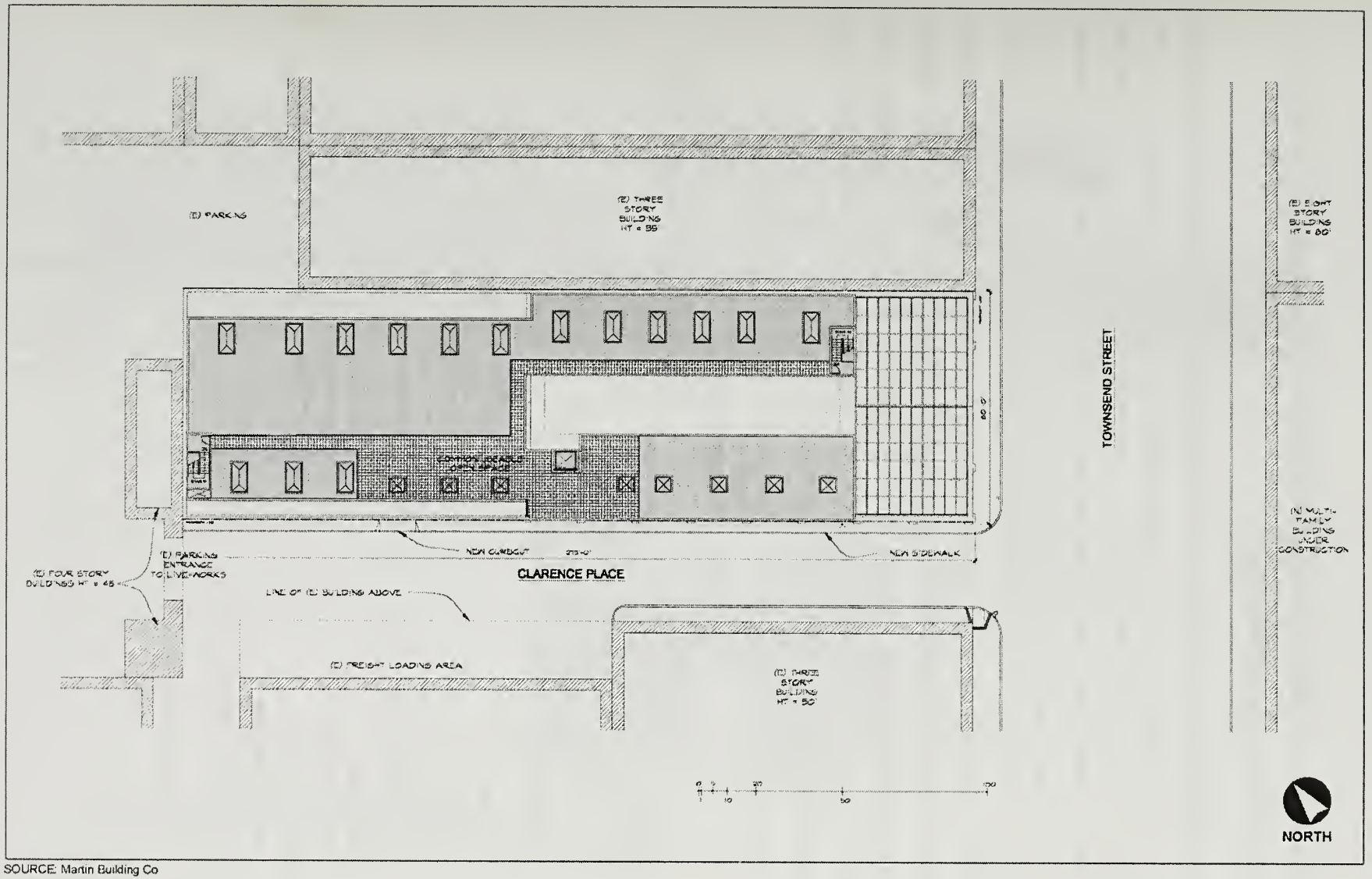
[1] The Project Sponsor submitted an application for the project prior to July 18, 2006, when the amount of BMR units required by the City went up to 15 percent.



SOURCE: EIP Associates.

178 TOWNSEND STREET PROJECT

FIGURE 1: PROJECT LOCATION MAP



SOURCE: Martin Building Co

178 TOWNSEND STREET PROJECT

FIGURE 2: SITE PLAN

Figure 3 illustrates the elevations of the proposed project from Clarence Place and Townsend Street. Figure 4 depicts the proposed building sections.

At 42 feet in height, the peak of the roof of the existing structure is lower than the peak of the stepped parapet. All new construction would be contained within the footprint of the existing structure, but would rise above the existing pitched roofline to a maximum height of 50 feet. New construction would include a partially below-grade parking garage, a five-story structure containing the residential and retail components, and street improvements along Clarence Place (see Figure 5). The project would include approximately 62,000 gross square feet (gsf) of residential uses, 2,350 gsf of ground-floor retail uses fronting Townsend Street, and 5,400 gsf of common usable open space for the residential uses. Proposed changes to the existing structure include removal of the existing corrugated steel roof and addition of window openings. The project proposes to construct the new structure with contemporary materials, which would contrast with the existing building and would be visible above the existing roofline. Table 1 summarizes the proposed project uses.

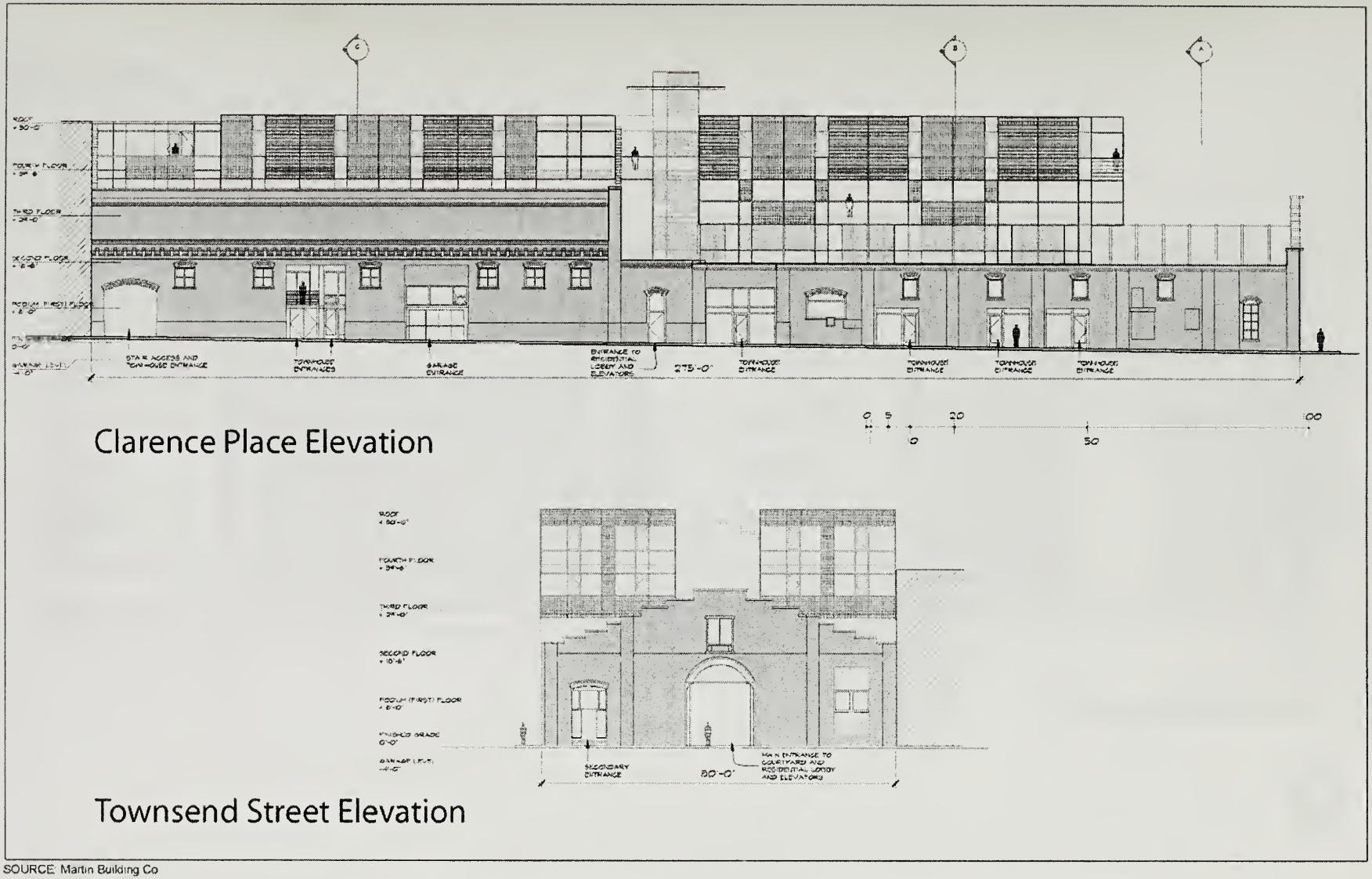
TABLE 1
PROJECT DESCRIPTION

Category	Project Totals (approximate)
Residential	62,000 sf
Retail	2,350 sf
Parking & Loading, Mech. & Storage	13,200 sf
Common Area, Circulation, & Building Service	8,400 sf
Open Space[1]	5,400 sf[1]
TOTAL	**Approx. 86,000 sf**
Dwelling Units	Up to 85
Parking Spaces	74
Loading Spaces	0
Height of Buildings	50 feet
Number of Stories	5
Number of Buildings	1

Source: Martin Building Co., 2006.

Note:

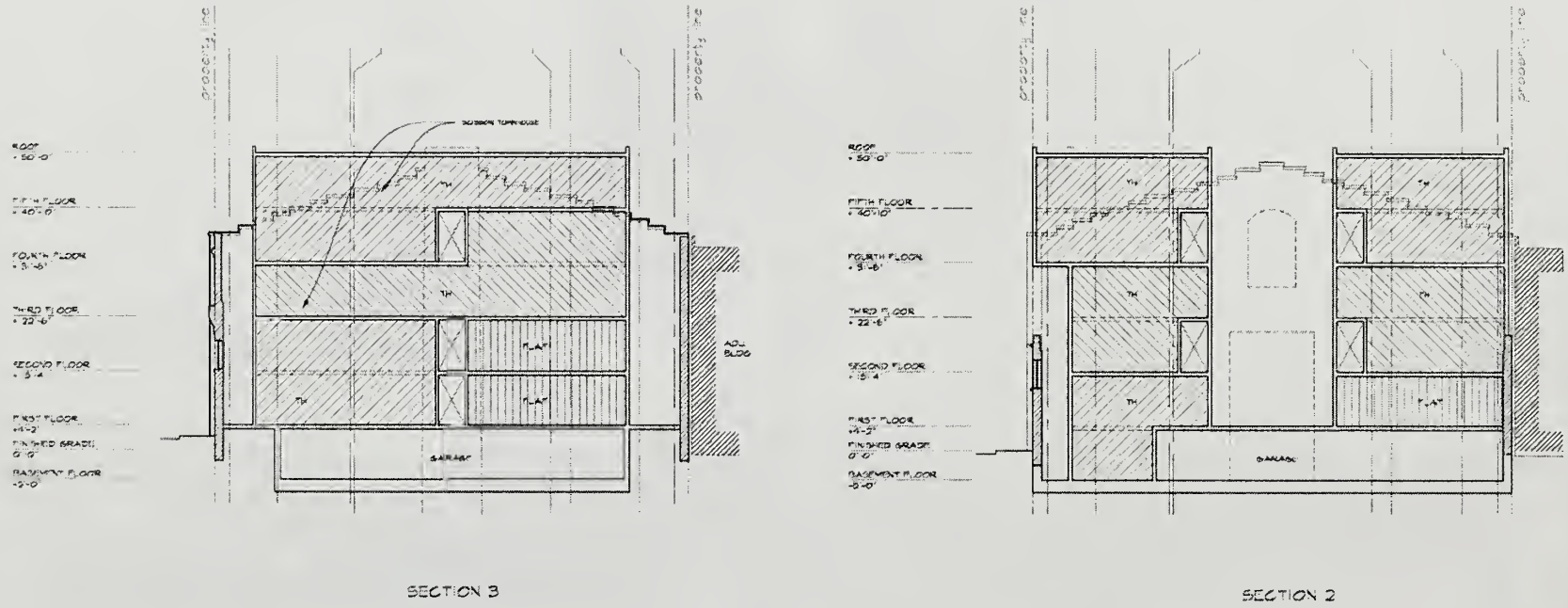
1. Open space is not counted in total floor area.



SOURCE: Martin Building Co

178 TOWNSEND STREET PROJECT

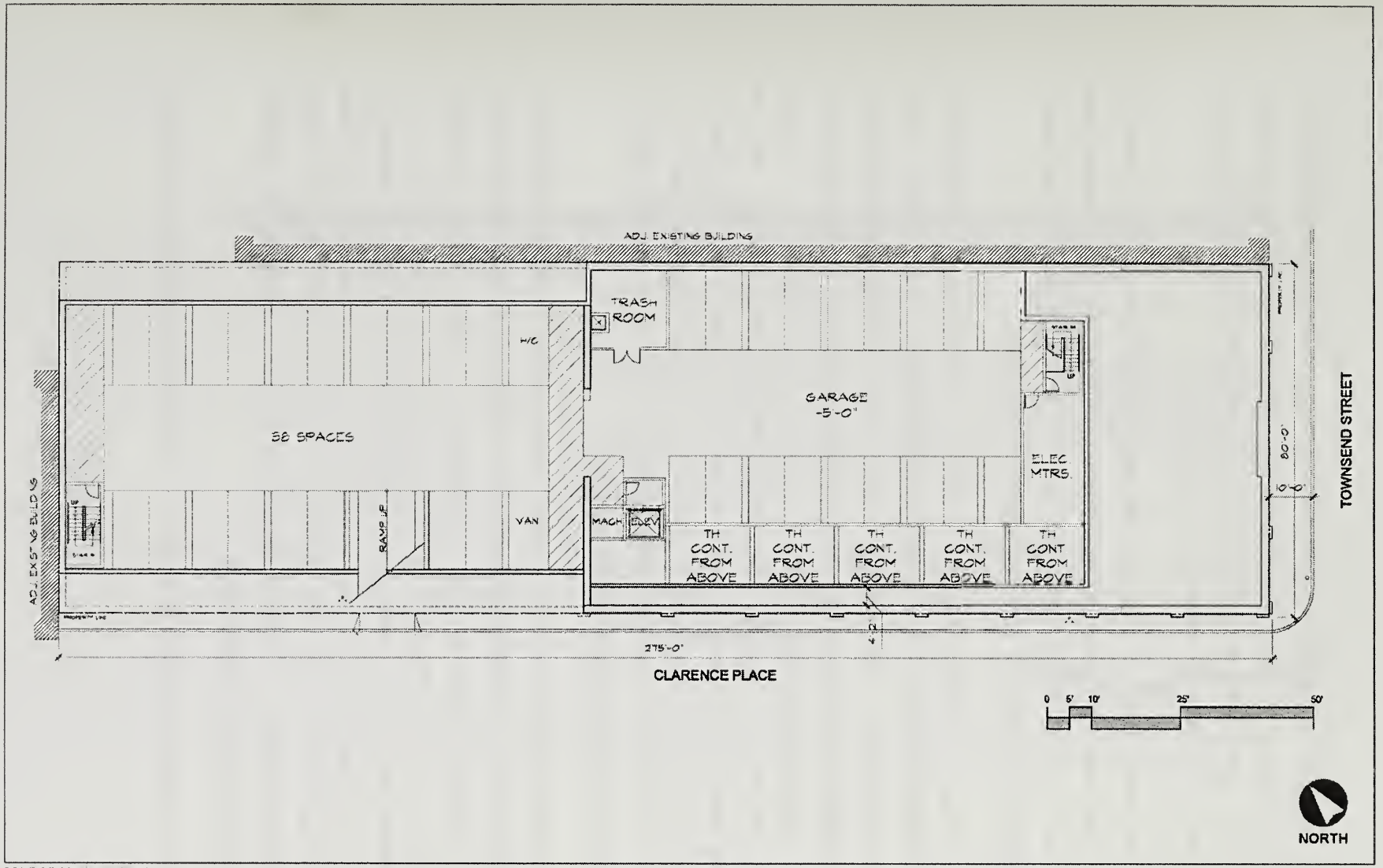
FIGURE 3: PROPOSED TOWNSEND STREET AND CLARENCE PLACE ELEVATIONS



SOURCE: Martin Building Co

178 TOWNSEND STREET PROJECT

FIGURE 4: PROPOSED BUILDING SECTIONS



SOURCE: Martin Building Co

178 TOWNSEND STREET PROJECT

FIGURE 5: BASEMENT FLOOR PLAN

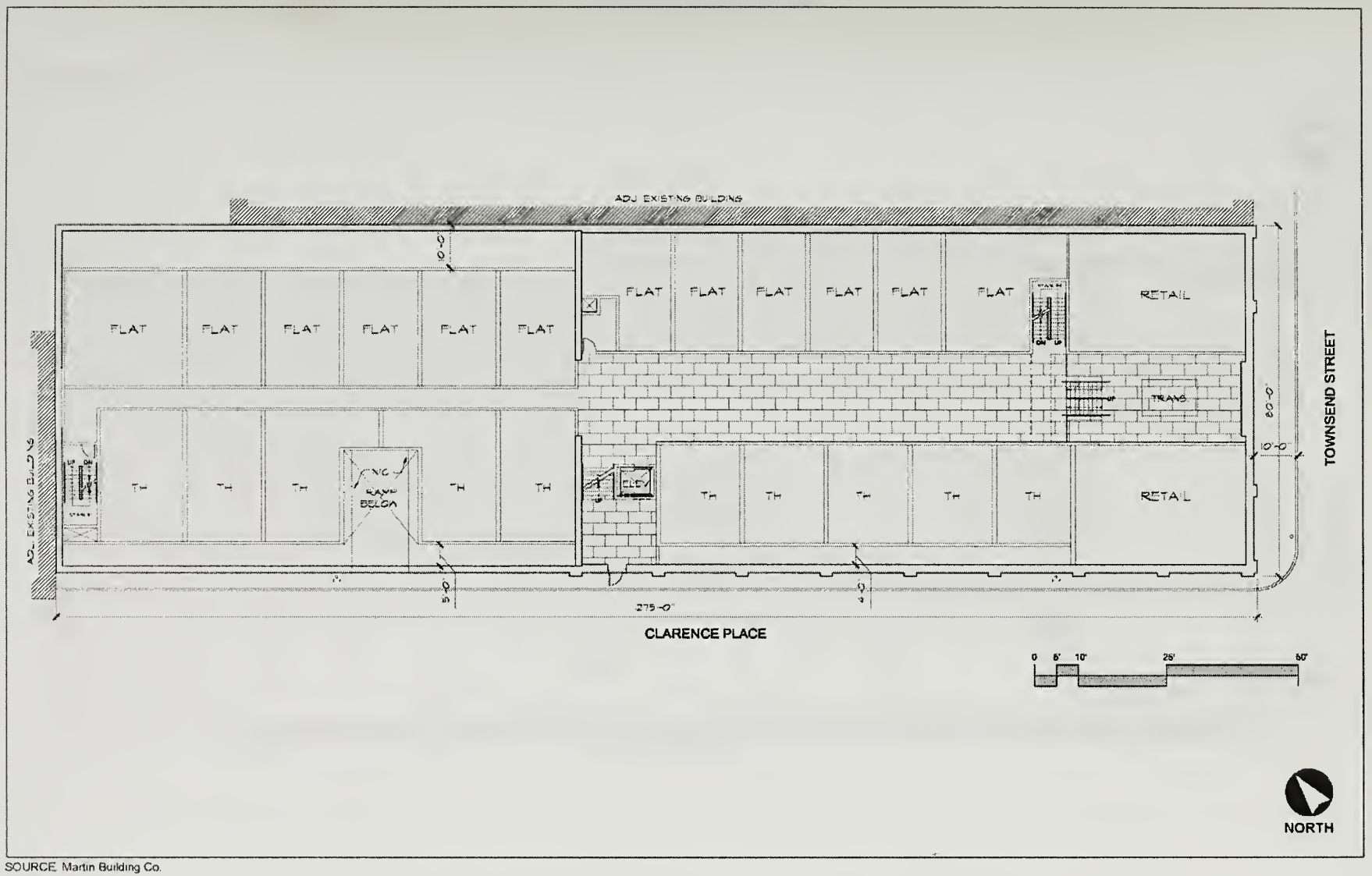
The residential component of the proposed project would contain a mixture of one-bedroom, two-bedroom, and three-bedroom units. The exact configuration of units within the structure has not been determined at this time; figures in this document include 67 residential units. However, this document analyzes impacts based on a residential component of up to 85 units.

The proposed project would include retail uses in the area fronting Townsend Street, within the existing structure. There would be two separate retail spaces, one on each side of the Townsend Street entrance, with a total floor area of about 2,350 square feet. The retail uses would be constructed at grade, with pedestrian access through the main entrance on Townsend Street.

The project would include a covered plaza in the area fronting the retail uses along Townsend Street (see Figure 6), immediately behind the walls of the Townsend Street façade, which would be open to the public during business hours. The project would also construct a new public sidewalk along Clarence Place. Residential common open space would be provided in a center courtyard located atop an approximately eight-foot-high parking podium. The courtyard would be connected to the retail plaza by a central stairway (see Figure 6). The courtyard would be open to the sky, with open corridors providing access to the upper-story units in the front portion of the building (see Figure 7). Additional common usable open space would be provided on a rooftop deck (see Figure 8). The combined 5,400 gsf of proposed common usable open space would exceed the *Planning Code* requirement of 4,080 gsf residential common usable open space.

The partially below-grade parking garage would provide 72 parking spaces (13,200 square feet) in two-car parking stacker systems. The parking garage would also provide two ADA-accessible spaces in addition to the car stackers, and bicycle parking in stacked shells. The rear volume of the existing building would be excavated to accommodate the parking garage, as shown in Figure 5. Garage access would be provided through an existing opening located mid-block on Clarence Place, and controlled by a security gate. The driveway/aisle area of the parking garage would be approximately 4 feet below grade. Additional excavation to a depth of 8 feet would be required for parking lift pits to provide access for the proposed stackers. The parking garage would serve as a podium for the residential building, approximately 8 feet above finished grade.

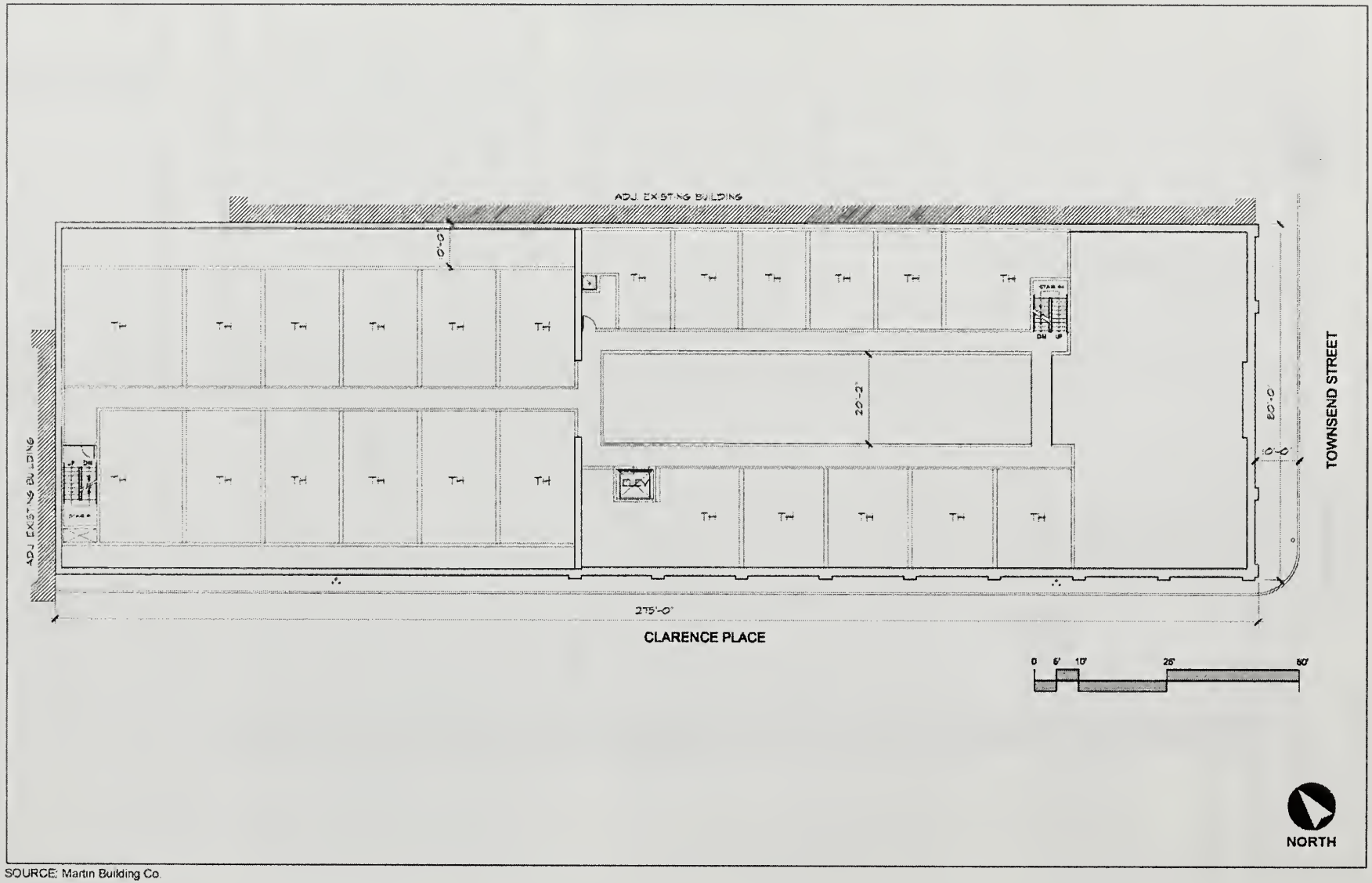
Project construction is anticipated to begin in 2007 and would require approximately 12 to 18 months to complete.



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

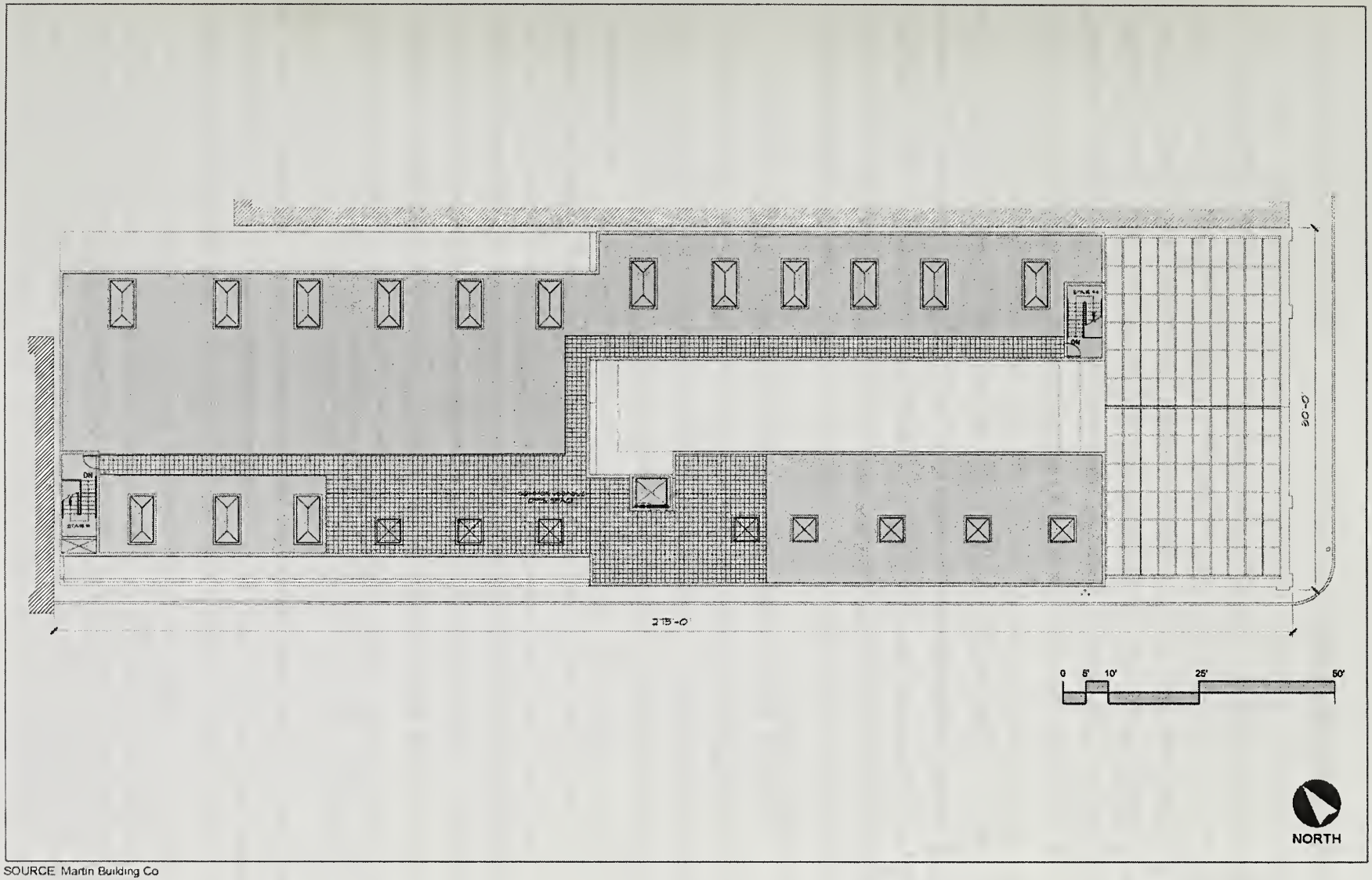
FIGURE 6: FIRST (GRADE) FLOOR PLAN



SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 7: FOURTH FLOOR PLAN



SOURCE: Martin Building Co

178 TOWNSEND STREET PROJECT

FIGURE 8: ROOF PLAN

B. PROJECT SETTING

Land uses in the immediate vicinity of the project site include a mix of residential, recreation, retail, and office uses, with limited light industry and warehouse uses. Directly north of the project site, behind the existing on-site building, is a four-story live/work residential building with surface parking. To the east, (within the same block and adjacent to the project site, is a three-story live/work building. Adjacent to that site, at the corner of Townsend Street and Third Street, is a McDonald's restaurant with a drive-through lane and surface parking. To the south, across Townsend Street, is an existing eight-story building with a mix of retail, parking, and office space. Directly across the street at 177 Townsend Street, a 10-story mixed-use multi-family residential and commercial building is under construction. Across the intersection of Townsend Street and Third Street to the south and southwest, there is a 16-story mixed-use building with a ground-level Borders Bookstore and housing/office uses above, and a five-story building containing live-work lofts with ground-floor retail. To the west, across Clarence Place, is an existing, brick, three-story office building with an adjacent three-story office and warehouse building.

Within the larger neighborhood context, mixed land uses are also prevalent, with a growing number of high-density residential projects. Three blocks north of the project site across Brannan Street is the South Park area with residential, retail, and recreational park space. AT&T Park, the San Francisco Giants ballpark, is on King Street, one block south of the proposed project site. The northeasterly portion of the Mission Bay Project Area is near the project site, beginning at Third and Townsend Streets. The 303-acre Mission Bay area extends south to Mariposa Street, and is being developed with mixed-use residential, commercial, medical and bioscience research, office, and community facilities. The Caltrain Depot, a major transit facility serving the Peninsula, is two blocks west of the project site at Fourth and Townsend Streets. The project site is served by several MUNI bus lines as well as the N-Judah MUNI Metro light rail line on King Street. The new T-Third light rail line, starting weekend service in January 2007 and full service in April 2007, will also serve the area.

The project site is within an SLI (Service/Light Industrial) zoning district, which is intended to retain existing general commercial, manufacturing, home and business service, arts uses, light industrial activities, and small design professional office firms, by excluding general office and most residential uses. Existing group housing and dwelling units are protected from demolition or conversion to nonresidential use, and development of group housing, single room occupancy (SRO) units, and dwelling units affordable to low income households are permitted as conditional uses. Residential uses other than group housing, SROs, and dwelling units affordable to low income households are not

permitted in the SLI District. However, pursuant to Section 803.5(c), of the *Planning Code*, any use which is permitted as a principal or conditional use within the Service/Secondary Office (SSO) District may be permitted as a conditional use in Contributory Buildings within any designated historic district within the South of Market Base District. General office, hotels, movie theaters, nighttime entertainment, and adult entertainment uses are not permitted. One block south of Townsend Street is an M-2 district. Three blocks east of the project site is an SSO (Service and Secondary Office) designation. Three blocks north of the project site, across Brannan Street, is South Park, a public open space, surrounded by the mixed-use SPD (South Park District).

The project site is within a 50-X Height and Bulk District, which limits the height of buildings within the zone to 50 feet. On the south side of Townsend Street, directly across from the project site, is a 105-F Height and Bulk District, limiting the height of buildings within this zone to 105 feet. North of the project site, across Brannan Street, is a 40-X Height and Bulk District which surrounds South Park, with the height limited to 40 feet.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	Applicable	*Not Applicable*
Discuss any variances, special authorizations, or changes proposed to the *Planning Code* or Zoning Map, if applicable.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☐	☒
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☐	☒

Land use policies pertaining to the project site include: *Planning Code* zoning requirements, *General Plan* policies, and proposed rezoning for the Eastern Neighborhoods, as well as the Planning Commission's 2004 Eastern Neighborhoods Interim Policies (PC Resolution No. 16727).

The *San Francisco Planning Code*, which incorporates by reference the City's Zoning Maps, also governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to alter existing buildings (or to construct new buildings or demolish existing ones) may not be issued unless either the proposed project conforms to the *Planning Code*, or an exception is granted pursuant to provisions of the *Planning Code*.

As stated in the Project Description, the project site is in an SLI (Service/Light Industrial) district within the South of Market Base District. The intent of the SLI district is to retain light industrial uses by excluding general office and most residential uses. In the SLI district, permitted uses include general commercial, manufacturing, home and business service, arts uses, light industrial activities,

and small design professional office firms. Group housing, SRO units, and dwelling units affordable to low income households are permitted subject to conditional uses authorization. Other residential uses are not usually allowed in SLI Districts. However, pursuant to *Planning Code* Section 803.5(c), any use which is permitted as a principal or conditional use within the Service/Secondary Office (SSO) District may be permitted as a conditional use in Contributory Buildings within any designated historic district within the South of Market Base District. Market-rate dwelling units are a conditional use in the SSO district, and therefore may be authorized as a conditional use at the project site.

Pursuant to Table 151 in Section 151 of the *Planning Code*, one off-street parking space would be required for every dwelling unit provided in the project, or up to 85 spaces. No off-street parking would be required for the proposed retail use because it would not exceed 5,000 gsf of floor area. The proposed project would provide off-street spaces for 74 vehicles; the project sponsor will seek variances for a reduction in the required amount of off-street parking if the number of units exceeds the number of spaces in the final project proposal.

The project site is in a 50-X Height and Bulk District, which permits construction to a height of 50 feet. The height of the finished roof as measured under the *Planning Code* would be 50 feet. The elevator penthouse would rise up to 14 feet in height above the roofline; rooftop elevator enclosures of up to 16 feet in height are exempt from height limits per *Planning Code* Section 260(b). The proposed project would therefore comply with the 50-X Height and Bulk District limits.

The permitted density of dwelling units under the SSO district, and the SLI district by extension, is one dwelling unit for every 200 square feet of lot area, pursuant to *Planning Code* Section 207.5(b). At this density, the project site lot area of 22,000 square feet could accommodate up to 110 dwelling units; up to 85 units are proposed; the project would be within the permitted density.

The total floor area of the project, including all land uses, would be about 86,000 gsf, the majority of which would be in residential use. Residential floor area and required off-street parking are not counted against Floor Area Ratio (FAR) restrictions. Accordingly, the total floor area of the project subject to FAR restrictions as defined by Section 102.9 of the *Planning Code* would be about 2,350 gsf (the area of the proposed retail space). Because the subject property has a lot area of about 22,000 gsf, this would result in a FAR of about 0.11 to 1. In the SLI District, a 2.5:1 FAR is allowed under Section 124(a) of the *Planning Code*, and a 3:1 FAR is allowed in the SSO District (for properties in height and bulk district of 64 feet or below). The proposed project would therefore comply with FAR restrictions for both SLI and SSO zoning.

The *San Francisco General Plan* provides general policies and objectives to guide land use decisions. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project. The project site is within the geographic area addressed in the South of Market Area Plan of the *General Plan*. The proposed project would be subject to the overall policies in the *General Plan*, as well as the South of Market Area Plan polices. The relationship of the proposed project to the objectives and polices of the *General Plan* will be discussed in the EIR.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City *Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology and Soils); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8 a and b, Wind and Shadow, and Questions 9a and c, Recreation and Public Space). Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the project will contain the Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies.

The proposed project would be consistent with the City's current land use policies for the project site, set forth in the 2004 Eastern Neighborhoods Interim Policies. These policies allow the development of

mixed-use housing on the project site. As part of the greater Eastern Neighborhoods planning process, the Planning Department is in the process of rezoning this part of the South of Market (called "East SoMa" by the Department) neighborhood.

The City is currently studying three rezoning options for the project vicinity, A, B, and C, that would balance two of the priorities included under Proposition M legislation: housing provision and protection of existing industrial land uses. The proposed project would be consistent with all rezoning options as a primary use. Option B, which is set forth in the February 2003, *Community Planning in the Eastern Neighborhoods Rezoning Options Workbook*, designates the project vicinity for eventual rezoning to "Residential/Commercial," a new district that would be designed to promote development of mixed use projects with flexibility in zoning controls. PDR activities would be permitted, but preservation of PDR uses and structures would not be a goal of the district. The Residential/Commercial Zoning is also proposed for the project site under Option C. Under Option A, the site would be zoned Residential/PDR, a district in which space for PDR uses would be required in new development, but residential use would also be permitted.

The Planning Department is also preparing an area plan for this part of the Eastern Neighborhoods and presented a draft version of the East SoMa Area Plan at a Community Workshop on October 3, 2006. The plan called for retention of the existing SLI zoning on the project site and in its vicinity. Proposed modifications to the SLI zoning district would include measures to promote development of affordable housing and small offices. The provisions in the existing SLI zoning district allowing for uses permitted in the SSO district as conditional uses in Contributory Buildings, including market-rate housing, are proposed for retention under this proposal. If this zoning and land use controls are adopted, the proposed project would continue to be consistent with the zoning on the project site.

PROJECT APPROVALS

The proposed project would require approval of a Certificate of Appropriateness under *Planning Code* Section 1006 for alteration of a Contributory Building in the South End Historic District by the Landmarks Preservation Advisory Board (LPAB); variance approval by the Zoning Administrator; Conditional Use approval by the City Planning Commission (Commission); and issuance of building permits by the Department of Building Inspection (DBI) and Department of Public Works (DPW) for sidewalk construction.

The California Electric Light Company Station B building is a Contributory Building in the South End Historic District. Within this historic district, any alterations requiring a permit and/or any exterior

changes visible from a public street require a Certificate of Appropriateness. Also, a Certificate of Appropriateness is required for cleaning masonry with abrasives or chemically waterproofing masonry surfaces. The Certificate of Appropriateness process for alterations requires review by the Landmarks Preservation Advisory Board, a public hearing, and final approval from the Planning Department. No construction or alteration permits would be granted until a Certificate of Appropriateness has been granted.

The approvals that would be required in accordance with the *Planning Code* are listed below. The relevant *Planning Code* section, which refers to these approval requirements, is cited for each approval item.

- Conditional Use authorization for the provision of residential units in a Contributory Building within the Extended Preservation District[2] (South End Historic District) pursuant to *Planning Code* Section 803.5(c);
- Zoning Administrator determination regarding a variance in the number and type of parking spaces pursuant to *Planning Code* Section 151, the residential rear yard requirement (Planning Code Section 134(a)), and, potentially, for open space and dwelling unit exposure requirements;
- Certificate of Appropriateness for alterations, exterior changes, and chemical treatments to a building within the Extended Preservation District pursuant to *Planning Code* Article 11.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

☒ Land Use	☒ Air Quality	☐ Geology and Soils
☐ Aesthetics	☐ Wind and Shadow	☐ Hydrology and Water Quality
☒ Population and Housing	☐ Recreation	☐ Hazards/Hazardous Materials
☒ Cultural Resources	☐ Utilities and Service Systems	☐ Mineral/Energy Resources
☒ Transportation and Circulation	☐ Public Services	☐ Agricultural Resources
☐ Noise	☐ Biological Resources	☒ Mandatory Findings of Significance

This Initial Study examines the proposed project to identify potential effects on the environment. On the basis of this study, project-specific effects that have been determined to be potentially significant include: cumulative land use, cumulative population and housing, transportation/circulation, air quality and cultural resources. With the exception of air quality and archaeology, for which mitigation measures have been identified, these issues will be analyzed in an Environmental Impact Report (EIR).

[2] The Extended Preservation District is an area formerly zoned C-3-S, in which provisions of *Planning Code* Article 11 and Section 128 continue to be in effect.

Two mitigation measures for impacts found to be potentially significant are included in this Initial Study, one to mitigate potential impacts of the proposed project on archeological resources, and one to mitigate potential impacts to air quality resulting from construction of the proposed project. The discussion of these mitigation measures can be found in Section F of this document; these topics do not need to be addressed in the EIR. Effects of the project that have been determined to be less than significant include: aesthetics, noise, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards/hazardous materials, mineral/energy resources, and agricultural resources. Those issues are discussed below and require no further environmental analysis in the EIR. For issues requiring mitigation to reduce the impact to a less-than-significant level, mitigation measures are specified at the end of this document and are referred to in the environmental analysis. For each checklist item analyzed, the evaluation has considered the impacts of the project both individually and cumulatively.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
1. **LAND USE AND LAND USE PLANNING— Would the project:**					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☒	☐	☐
c) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the *General Plan*, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐	☐

The project site is currently occupied by the California Electric Light Company Station B building, a historic structure that in the past has supported a number of warehouse and light industrial uses. Currently, the property is used as an indoor valet parking facility.

The proposed project would introduce new residential and retail uses at the project site in an area that has undergone extensive conversion to mixed use/residential uses in the past five years. As noted above in the project description, the project site is surrounded by a mix of existing residential and commercial uses. Thus, the change in land use from commercial valet parking to residential and retail uses within the walls of the existing historic building would not significantly disrupt or divide the physical arrangement of this portion of Townsend Street or the surrounding area.

The project is located in the South of Market (SoMa) neighborhood of San Francisco, which is characterized by its mixture of light industrial, residential, and commercial uses, as well as a tradition of adaptive reuse of the existing industrial architecture. The project would reuse the historic California Electric Light Company Station B building by maintaining the exterior structure and converting the interior to residential and retail uses, a concept that is consistent with development trends in the area. Therefore, the project's contribution to the physical change in the character of Townsend Street, and the overall East SoMa neighborhood, would not result in a significant land use impact.

A major planning/policy issue in East SoMa and in the Eastern Neighborhoods as a whole is the conversion of buildings or property in current or potential Production, Distribution, and Repair (PDR) use to non-PDR use. Adopted by the Planning Commission in Resolution 16727, the current PDR land use category includes light industrial, design, manufacturing, distribution, and specialized services. Examples of PDR uses include: fashion/garment assembly; delivery services; event production and catering; construction and building material wholesalers; wholesale and retail of furniture, equipment, and appliances; printers, designers, photographers, film producers, graphic designers, and sound-recording firms; repair shops for cars, equipment, etc.; and specialty manufacturing.[3] Many PDR land uses fall into the broader category of light industrial or manufacturing uses; however, these uses also directly support key industries such as grocery or clothing retailers, auto repair shops, tourism, offices, and other businesses requiring local assembly, distribution, storage, or repair services. A 2002 study[4] of the importance of PDR uses in a Citywide economic context suggested that the loss of PDR uses within the City would have secondary impacts on many of the City's major industries.

As discussed in Section C of this Initial Study, the Planning Department is currently considering a new area plan and new zoning for East SoMa. When complete, the East SoMa Area Plan will ultimately include a document setting forth goals, objectives and policies for the area, as well as a proposal for permanent zoning controls (*Planning Code* amendments). This effort is part of the larger planning process for the Eastern Neighborhoods, for which an EIR that analyzes the neighborhood and citywide impacts of rezoning the entire planning area (including the East SoMa, Showplace Square/Potrero Hill, Mission District and Central Waterfront plan areas) is being prepared. The Draft EIR will analyze the potential impacts of rezoning under "Options A, B, and C". These options are discussed in Section C

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[3] San Francisco Planning Department, *Industrial Land in San Francisco: Understanding Production, Distribution, and Repair,* July 2002. Accessible on the Planning Department's website at: http://www.sfgov.org/site/uploadedfiles/planning/communityplanning/pdf/pdr_report.pdf

[4] San Francisco Planning Department, *Industrial Land in San Francisco: Understanding Production, Distribution, and Repair,* July 2002.

of this document. The latest draft East SoMa Plan, presented at a public workshop on October 3, 2006, retains the existing SLI zoning on and around the project site.

The project site was last occupied by a PDR use in 2000, when it housed the West Wind Auto Repair and Paint Shop.[5] As discussed above, the existing use is commercial parking and thus the proposed project would not displace an existing PDR use. The property's current SLI zoning would permit PDR use on the property. The developed square footage at the project site is approximately 22,000 square feet, and, as the proposed project would involve developing the site with non-PDR uses, implementation of the proposed project would therefore result in a loss of 22,000 square feet of space that could theoretically be developed for future PDR uses.

The area around the project site primarily includes residential, live-work, retail, and office uses. In recent years there has been a substantial amount of residential development in the immediate area, which has become an attractive location for residential use with the addition of AT&T Park, development of Mission Bay, and improvement in Caltrain service to the Peninsula. Local-serving commercial uses are also being developed in the area, supporting the increased residential development. The addition of residential and retail use on the project site would be consistent with the actual land uses in the project vicinity, especially as they have evolved in recent years. However, with the mix of existing uses, there is a potential for land use conflicts between residential uses and some types of PDR uses that are allowed under the existing SLI zoning in the vicinity.

The loss of building space or land with zoning designations that would permit future PDR uses does not, in itself, constitute a physical environmental effect at the project level. In the case of the proposed project, there are no existing PDR uses or jobs at the site and, there is not an identifiable conflict with City land use policies at the project level.

Cumulative Land Use. Although the project-level land use impacts would be less than significant, the proposed project's contribution to cumulative impacts, when combined with other reasonably foreseeable development, may be significant. The Board of Supervisors adopted a motion on February 7, 2006 finding that a mitigated negative declaration for a proposed project at 2660 Harrison Street was inadequate because "there appears to be substantial evidence to support a fair argument that the project *[2660 Harrison Street]* may have potentially significant environmental effects that were not considered or mitigated.... on [1] the loss of PDR jobs and businesses, [2] on the City's ability to meet

[5] ACC Environmental Consultants, *Phase I Environmental Site Assessment 166-178 Townsend Street, San Francisco, California*, March 17, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

its housing needs as expressed in the City's *General Plan*, and [3] on land use and housing as delineated in the Department's environmental evaluation checklist." Based on the Board's decision that additional analysis needed to be completed to determine if land use changes caused by cumulative non-PDR development in the Eastern Neighborhoods might be adverse, the EIR will address potential indirect and cumulative land use effects associated with the project, including the cumulative impacts of individual development projects on the City's ability to meet its PDR space needs in the Eastern Neighborhoods and housing needs expressed in the General Plan.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	☐	☐	☒	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	☐	☐	☒	☐	☐

The project site contains the California Electric Light Company Station B building, a historic brick warehouse. Surrounding development in the project vicinity ranges from one- to ten-story residential and commercial buildings. The project site is bounded by an existing four-story building to the north, at the rear of the project site; a three-story building to the east; a three-story building to the west, across Clarence Place; and a newly-constructed approximately ten-story building south of the project site, across Townsend Street.

The architectural character of the area varies, including many older one- to three-story warehouse structures among contemporary mixed-use residential/commercial buildings, along with paved areas and surface parking lots. Heights range from one to ten stories, with contemporary buildings generally taller than older buildings. Many buildings in the area have solid massing, with uniform or semi-uniform setbacks. Large institutional structures, the AT&T Ballpark, and the Caltrain Station are also found in the vicinity of the project site. Despite the area's mix of land uses and the variation in buildings' ages, the built environment in the project vicinity consists of a relatively harmonious visual setting that is achieved through means such as strategic contrasts between modern materials (e.g., glass, steel) with historic materials (e.g., brick), the restrained use of architectural detailing on modern structures, and use of other design elements (color, landscaping, etc.) to create attractive public space.

The proposed project would consist of a five-story, 50-foot building, constructed within and extending above the existing building walls, set back approximately 40 feet from the Townsend Street façade. The new development would be taller than the existing California Electric Light Company Station B building at the site. Although the proposed project would include two more stories than the neighboring three-story buildings, these neighboring buildings are particularly tall for three-story buildings at approximately 50 and 55 feet high. The proposed project would be comparable in height to the five-story industrial building southwest of the project site. Due to the proposed project's similarity in height to surrounding buildings, and because the addition would be set back 40 feet from the front of the building façade, the massing of the proposed project would fit the existing visual context while preserving setbacks over the building front to maintain the historic façade as the visual focus. The new structure would delineate itself from the existing building through the proposed materials and design. Figure 9 shows the conceptual design for the proposed project. As shown in the figure, there would be a contrast of materials between the rehabilitated brick exterior of the existing building and the contemporary design for the proposed structure.

The proposed building would be visible from nearby locations on Townsend Street, but would generally not be visible from other streets due to the similar or greater heights of existing buildings near the project site. Figure 10 depicts the proposed massing from various vantage points along Townsend Street. The proposed project would be visible from residences and businesses adjacent to the project, but would not significantly change views from residences and businesses one block or more from the project site. Within the immediate project area, development of the new building would replace views of the existing structure with views of the renovated existing structure, and portions of the proposed new building. With implementation of the proposed project, views from surrounding buildings would consist of a 50-foot glass and steel structure rising above the existing brick façade, which varies in height from approximately 50 feet at its highest point to approximately 20 feet along the front portion of Clarence Place. However, the new building would be set back about 40 feet from the façade. The addition would be relatively minor given the overall massing of the surrounding buildings; the addition would only be seen from the public right-of-way within a relatively small radius. This change in private views from nearby buildings would not be considered a significant adverse effect on visual quality. The contrast in styles between the addition and the existing building would be in keeping with the mixed aesthetic character of the area.

SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 9: CONCEPTUAL DESIGN

SOURCE: Martin Building Co.

178 TOWNSEND STREET PROJECT

FIGURE 10: PROPOSED MASSING

Although evaluations of visual quality are to some extent subjective, overall it can be concluded that the proposed project would not have a substantial, demonstrable negative aesthetic effect on visual resources on-site or within the immediate visual setting. Aesthetic issues associated with the historic preservation aspects of the proposed project will be discussed in the EIR.

Existing public open space in the project vicinity includes South Park, one and one-half blocks north of the project site, and South Beach Park along The Embarcadero, about two and one-half blocks east of the site. Views from these areas would not change as a result of the proposed project due to the extent of urban development and existing building heights between these areas and the project site. The proposed project would not degrade scenic views of the San Francisco Bay waterfront or other public areas, and would not substantially degrade or obstruct any scenic view or vista now observed from public areas.

Additional ambient light sources would be introduced by the proposed project but would not significantly affect surrounding properties. New lighting would include light within the dwelling units and commercial/retail spaces, and light fixtures at the buildings' entrances and pedestrian walkways typical of residential and commercial development. The proposed project would comply with City Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Mirrored glass would not be used, and no other aspect of the buildings would result in light or glare that would significantly impact other properties. As a result, the proposed project would not generate obtrusive light or glare that could substantially impact other properties.

For the reasons discussed above, the proposed project would not have a significant visual quality impact.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☒	☐	☐	☐	☐
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☐	☒	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

The development of up to 85 dwelling units and 2,350 gsf of retail space would result in an on-site population increase of about 202 residents and employees.[6,7] The 2000 U.S. Census indicates that the population in the project's census tract and the adjacent census tract (Census Tracts 179.01 and 607), together comprising the area bounded by Howard Street, The Embarcadero, Townsend Street, and Third Street, is approximately 5,408 persons.[8] Because of new residential development in this area, the local population has likely increased since 2000. The project would increase the overall residential population of the City and County of San Francisco by approximately 195 persons, or less than 0.1 percent,[9] and would increase the population in Census Tracts 179.01 and 607 by approximately four percent. Therefore, the proposed project would not result in a significant increase in population, directly or indirectly.

As noted above, the project site currently is a commercial parking lot, hence there would be no residents displaced as a result of the proposed project. The proposed project would displace approximately three parking attendant/valet jobs associated with the current use of the building as a parking facility. With the proposed retail uses, there would be seven new employees, a net increase in employment of four jobs.

Residential units proposed under the project would help address the City's broader need for additional housing in a citywide context in which job growth and in-migration outpace the provision of new housing. In March 2001, the Association of Bay Area Governments (ABAG) projected regional needs in its Regional Housing Needs Determination (RHND) 1999–2006 allocation. The projected need of the City of San Francisco for 2006 (the most recent date for which data are available) is 20,372 new dwelling units, or an average annual need of 2,716 net new dwelling units. There is a particular need for units affordable to very low-, low-, and moderate-income households, which is addressed by the City's Inclusionary Affordable Housing Program, in *Planning Code* Section 315-315.9.

The proposed project would add up to 85 new residential units to the City's housing stock. The proposed project would satisfy about three percent of the total annual need for new dwelling units in the City. Of the units provided by the proposed project, approximately 12 percent (ten units) would be Below-Market-Rate (BMR) units, as required by the City's Inclusionary Affordable Housing Program

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6 Association of Bay Area Governments, *Projections 2005*. San Francisco City/County Projections 2005, 2.29 persons per dwelling unit. 2.29 persons per unit x 85 units = 195 persons.

7 Employees associated with the proposed project would equal approximately seven employees, assuming an average of one employee per 350 sf.

8 The project site is located near the borderline of one Census Tract, but across the street from another. The two tracts (179.01 and 607) together had a 2000 population of approximately 6,084.

9 The calculation is based on the estimated Census 2000 population of 776,733 persons in the City and County of San Francisco.

requirements.[10] These BMR units would be affordable to households earning up to 100 percent of the Area Median Income (AMI) and would contribute to the City's supply of moderate income housing.

While the proposed project would increase population and employment at the site compared to existing conditions, the project-specific impacts would not be significant relative to the number of residents and employees within the project vicinity. Overall, the increase in housing and employment would not be significant with regard to expected increases in the population and employment of San Francisco.

Cumulative Population and Housing. As noted in Section 318.1 of the *Planning Code*, the cumulative effect of converting properties in East SoMa from industrial to residential uses could result in the loss of buildings and land suitable for PDR and, by extension, the loss of PDR businesses and jobs. The proposed project could also affect the supply of and demand for affordable housing, and could induce the development of additional housing in the area. These potentially significant effects will be analyzed in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
4. CULTURAL RESOURCES— Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco *Planning Code*?	☒	☐	☐	☐	☐
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

Historic Architectural Resources. The proposed project site is currently occupied by the California Electric Light Company Station B building, which was built in 1888 and partially rebuilt after the 1906 earthquake to house electricity generation machinery. Several historic preservation policies and guidelines pertain to the project site and to the existing structure. The site is within the boundaries of the South End Historic District, designated in Article 10 of the San Francisco *Planning Code*. The California Electric Light Company Station B building has been identified as a Contributory Building within this District. Under the Planning Department's Historic Resources Policy, the existing building is "strongly presumed to be a historical resource." In addition, while not currently listed on the National Register of Historic Properties (NRHP), the building has been assigned a California Historical

[10] The Project Sponsor submitted an application prior to July 18, 2006, when the amount of BMR units required went up to 15 percent.

Resource Information System status code of 3D, which indicates that the property "appears eligible for NRHP as a contributor to a NRHP eligible district."[11] Because of the existing building's potentially historic nature, a historic resources evaluation (HRE) is being conducted to determine whether the proposed project would have any significant impacts under CEQA with regard to historic architectural resources. The effects of the proposed project on the existing historic structure will be addressed in the EIR.

Historic Archaeological Resources. An archeological research design and treatment plan (ARD/TP) has been prepared for the proposed project. The *Draft Archeological Research Design/Treatment Plan for the 178 Townsend Project,* prepared by Archeo-Tec in December, 2006,[12] addresses the prehistoric, historic, and natural formation contexts of the project site; the potential for archaeological resources to be present; the relationship of the expected resources to significant historical/scientific research themes; the eligibility of the expected resources for listing to the California Register of Historic Resources (CRHR); and the treatment of any discovered archeological resources.

Background research included a review of archaeological investigations in the vicinity of the project site and of archaeological records on file at the Northwest Information Center (NWIC) at Sonoma State University conducted specifically for the project site. The NWIC categorizes the area around the project site as having a low likelihood of containing unrecorded Native American cultural resources or burials. A Sacred Land File Search by the Native American Heritage Commission (NAHC) revealed no listed prehistoric "cultural resources" in the immediate vicinity of the project site (May 12, 2006).

At the time the ARD/TP was prepared, the project proposed excavation for underground parking to a maximum depth of 18 feet below ground surface in the northern portion of the property to accommodate the proposed garage and three-car stackers, and a maximum depth of 10 feet below ground surface in the southern portion of the property to accommodate the ground-floor retail and residential uses. After the ARD/TP was completed, the proposed project was modified and the maximum excavation depth would be 8 feet over the entire property, less excavation than originally proposed. The project would thus require less excavation, which would reduce the potential for disturbance of buried historic and archaeological materials. However, as discussed below, the project is still considered to have potential adverse effects on such sub-surface resources.

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[11] California State Office of Historic Preservation (2004). *User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory,* California Department of Parks & Recreation.

[12] Archeo-Tec, *Archeological Research Design/Treatment Plan for the 178 Townsend Project,* December 2006. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

Additional soils disturbance would result from a mat and spread-footings foundation. The analysis of the ARD/TP has demonstrated that prehistoric and historical archaeological resources may be present within soils affected by the proposed project and that these expected resources may have sufficient scientific/historical research potential to qualify for listing in the California Register of Historical Resources under criterion D. No prior soils-disturbing activities have been identified that would have significantly impaired the integrity of archeological resources or historic burial sites within the project site. Implementation of Mitigation Measure 1, Archaeological Resources, described on p. 53, would reduce potential impacts of the project to any CEQA-significant archaeological resources that might be uncovered during the construction process to a less-than-significant level. The Project Sponsor has agreed to implement this mitigation measure; hence, the project would not result in significant impacts to archaeological resources.

Paleontological Resources. Paleontological resources are the fossilized remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains, such as bones, teeth, shells, and wood, are found in geologic deposits (rock formations). Although no known paleontological resources have been recorded at the project site, paleontological resources may be found at depths greater than previously disturbed during past development. However, with implementation of Mitigation Measure 1, Archaeological Resources, the proposed project would not result in significant impacts to paleontological resources.

Geologic Resources. No unique geologic features exist on the project site, thus there would be no impact on such features as the result of project implementation.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
5. TRANSPORTATION AND CIRCULATION— Would the project:					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	☒	☐	☐	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	☒	☐	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☒	☐	☐	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
c) Result in inadequate emergency access?	☒	☐	☐	☐	☐
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	☒	☐	☐	☐	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	☒	☐	☐	☐	☐

The proposed project would replace an existing commercial parking facility and would increase on-site employment and housing. The existing public parking facility accommodates about 110 parking spaces. The vehicle trips associated with this use would be displaced to other off-street facilities and to on-street spaces, but it is assumed that they would remain in the project vicinity. The increase in the on-site population due to increased housing and employment would therefore result in an increase in vehicle trips in the project area and could result in traffic impacts at nearby intersections. A transportation study to be completed for the proposed project will determine the project's potential impacts and will be included in the EIR. Existing conditions and potential impacts from the proposed project will be discussed in the EIR.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local *General Plan* or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☐	☐	☒	☐	☐

Construction Noise. Demolition, excavation, and project construction would temporarily increase noise in the project vicinity. Construction would take about 12 to 18 months. During the majority of construction activity, noise levels would be above existing levels in the project area. Construction noise would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noise would be intermittent and limited to the period of construction. There are no noise-sensitive receptors such as schools or hospitals in the vicinity of the project site.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 decibels (dBA) at a distance of 100 feet from the source.[13] Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of the Department of Public Works (DPW). Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of the DPW. Compliance with the Noise Ordinance would reduce potential construction noise impacts to a less-than-significant level.

Traffic Noise. The existing noise environment in the project area is typical of noise levels in San Francisco. The primary sources of noise in the vicinity of the project site are traffic on Townsend Street and Third Street and MUNI bus lines on Third Street. Noise in the project vicinity also includes noise associated with current construction of the building across Townsend Street located at 175-179 Townsend Street. Traffic noise created by the project would be attributable to additional automobiles and limited truck deliveries, and the general coming and going of residents, employees, and other visitors. Preliminary review indicates that the proposed project would result in approximately 312 daily vehicle trips and 49 PM peak-hour trips.[14] An increase of 312 daily trips would contribute to traffic noise levels by only a small amount compared to existing noise levels on the surrounding streets. The proposed project traffic would result in an approximate increase of 0.2 dBA[15] during the PM peak hour along Townsend Street on the project block (between Third Street and Second Street), and a

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[13] A decibel (dB) is the unit of measurement used to express the intensity of loudness of sound. A decibel is one-tenth of a unit called a bel. Sound is composed of various frequencies. The human ear does not hear all sound frequencies. Normal hearing is within the range of 20 to 20,000 vibrations per second. As a result, an adjustment of weighting of sound frequencies is made to approximate the way that the average person hears sounds. This weighting system assigns a weight that is related to how sensitive the human ear is to each sound frequency. Frequencies that are less sensitive to the human ear are weighted less than those for which the ear is more sensitive. The adjusted sounds are called A-weighted levels (dBA).

[14] Wyznyckyj, Luba, LCW Consulting, personal communication to EIP Associates, January 10, 2007.

[15] Calculations completed by EIP Associates, a division of PBS&J, 2007.

0.1 dBA or less increase during the PM peak hour along other roadway segments in the project vicinity.[16] Given the environmental conditions within the City where traffic noise levels along City streets are between about 60 dBA and 70 dBA, a noise level increase of 0.2 dBA would not be perceived as an adverse impact. Therefore, the project-generated traffic would not cause a significant increase in the ambient noise levels in the project vicinity.

Building Mechanical Equipment Noise. The project buildings' occupancy and operation would generate noise from ventilators and other mechanical equipment. The project would comply with the San Francisco Noise Ordinance, San Francisco Police Code Section 2909, Fixed Source Levels, which regulates mechanical equipment noise. Project compliance with this Noise Ordinance section would ensure that the buildings' mechanical equipment noise would not substantially increase the ambient noise level of the surrounding area.

Residential Interior and Exterior Noise Levels. Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. The DBI would review the final building plans to ensure that the building wall, window, and floor/ceiling assemblies meet state standards regarding sound transmission. Hence, the proposed project would not be substantially impacted by existing noise levels.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
7. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. **Would the project:**					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒	☐

Emissions from Traffic. The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. These thresholds are based on the minimum size project which the BAAQMD considers capable of generating emissions with the

[16] Calculations completed by EIP Associates, a division of PBS&J, 2007.

potential to exceed the thresholds of 80 pounds per day each of reactive organic gases (ROG), nitrogen oxides (NO_x), and particulate matter with a diameter of less than 10 microns (PM_{10}). The BAAQMD considers residential projects greater than 510 apartment units, office projects greater than 280,000 gsf, and retail development greater than 87,000 square feet as candidates for potentially significant vehicular emissions. Since the proposed project includes up to 85 units and about 2,350 square feet of retail development, it would not exceed the BAAQMD threshold and no significant air quality impacts due to vehicular emissions are anticipated by the proposed project.

Construction Emissions. During project construction, air quality could potentially be affected. Heavy-duty construction equipment would emit NO_x, carbon monoxide (CO), sulfur dioxide (SO_2), hydrocarbons (HC), and PM_{10} as a result of diesel fuel combustion. PM_{10} also would be generated from construction activities such as excavation or soil movement.

Construction emissions during demolition, foundation excavation, and site grading could cause adverse effects on local air quality by adding wind-blown dust to the particulate matter in the atmosphere while soil is exposed. The BAAQMD, in evaluating air quality effects under CEQA has developed an analytic approach that obviates the need to quantify these emissions. Instead, the BAAQMD has identified a set of feasible PM_{10} control measures for construction activities on sites less than 4 acres. The proposed project site is approximately 0.5 acres. Implementation of the dust control measures delineated in Mitigation Measure 2, Construction Air Quality, described on p. 57, would reduce the air emission effects of construction activities to a less-than-significant level. The Project Sponsor would implement this mitigation measure; hence, the project would not cause significant construction-related air quality effects.

Operational Emissions. Project occupancy would result in a small amount of emissions from the use of electricity and natural gas for building heating, cooling, ventilation, and lighting. However, these stationary source emissions would not be significant. Also, traffic related to the proposed project would add more cars to area roadways, which could cause existing non-project traffic to travel at slower, less pollution-efficient travel speeds. The BAAQMD recommends analysis for study intersections that would operate at Level of Service (LOS) D, LOS E, or LOS F (these intersections have high congestion and, therefore, high localized concentrations of carbon monoxide (CO)). Based on preliminary review, under future cumulative conditions, the proposed project would add traffic to three intersections in the project area which currently operate at LOS D or worse during the PM peak hour.[17] These intersections at Second Street and King Street, Third Street and King Street, and Second

[17] Wyznyckyj, Luba, LCW Consulting, personal communication to EIP Associates, June 13, 2006.

Street and Bryant Street are currently operating at LOS D, LOS E, and LOS D, respectively. The proposed project would be expected to add 3, 11, and 9 peak-hour vehicles at each of these intersections, respectively. An increase of approximately 11 or fewer vehicles to an intersection would not be considered substantial in comparison to the existing traffic volumes. However, to verify the proposed project would not result in CO hotspots, a simplified CALINE4 screening model was used to determine CO impacts.[18] Calculations using the simplified CALINE4 model indicated that the proposed project would not result in CO levels above the 1-hour national standard of 35 parts per million (ppm), the 1-hour state standard of 20 ppm, or the 8-hour national and state standards of 9 ppm, at any of the three intersections; thus, the project would not be expected to result in CO hot spots and would not contribute to a significant cumulative impact on air quality.

Odors. The proposed project would include residential and retail uses, neither of which are expected to generate substantial objectionable odors. The proposed project would not expose sensitive receptors to objectionable odors.

Cumulative Air Quality. The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring analysis of potential air quality impacts. Operational emissions from the proposed project would be below BAAQMD thresholds for all criteria pollutants. As noted, under operational conditions the proposed project would not be expected to result in CO hotspots. Under cumulative conditions, the cumulative traffic volumes would result in four intersections operating at LOS E or F. The four intersections include the intersections at Second Street and King Street, Third Street and King Street, and Second Street and Bryant Street, which were analyzed under project conditions, plus the intersection at Third Street and Brannan Street, which would operate at LOS F under cumulative conditions. The proposed project plus cumulative traffic would result in an increase in traffic and the intersections would be operating at reduced levels of service; however, calculations using the simplified CALINE4 screening method indicate that the cumulative traffic volumes would not result in an exceedance of national or state CO standards, and therefore would not result in CO hot spots.[19] Additionally, the proposed project would not exceed the 80 lbs per day threshold for NO_x, ROG, or PM_{10}, as the project would be below the BAAQMD screening thresholds for residential and retail uses. Therefore, the project would not result in significant cumulative air quality impacts.

[18] Calculations completed by EIP Associates, a division of PBS&J, 2006.
[19] Calculations completed by EIP Associates, a division of PBS&J, 2006.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
8. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☐	☒	☐

Wind. Large structures can affect street-level wind conditions. Such effects can occur when a new large building extends above neighboring buildings, or contributes to the creation of a large wall facing into prevailing winds. The *Planning Code* establishes wind comfort and wind hazard criteria for certain zoning districts, including the Downtown C-3 districts, the Van Ness Special Use District, parts of Rincon Hill, and parts of South of Market. The project site is not within any of these districts. Also, the proposed building would be approximately 50 feet tall and would not extend above the surrounding buildings such that substantial wind effects would occur. Therefore, the proposed project would not have a significant adverse impact on wind conditions.

Shadow. Section 147 of the *Planning Code* sets a requirement that new buildings in certain districts, including SSO and SLI Districts, whose heights exceed 50 feet, shall be shaped "to reduce substantial shadow impacts on public plazas and other publicly accessible spaces." Townsend Street and Clarence Place are publicly accessible spaces. The proposed addition would reach a building height of 50 feet, below Section 147 thresholds.

Section 295 of the *Planning Code* was adopted in response to Proposition K (passed in November 1984) in order to protect certain public open spaces from additional shadowing by new structures in all zoning districts. Section 295 restricts new shadow upon public parks and open spaces under the jurisdiction of the Recreation and Park Commission by any structure exceeding 40 feet in height, unless the Planning Commission, in consultation with the General Manager of the Recreation and Park Department and the Recreation and Park Commission, finds the impact to be insignificant. While the proposed project would be subject to Section 295, the closest property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission in the surrounding area is South Park, approximately 0.2 miles north of the project site. The Planning Department has reviewed the proposed project for compliance with Section 295 of the *Planning Code*, and based on a shadow fan analysis, there is no shadow impact from the subject property on any property protected by the

ordinance.[20] Accordingly, there would be no significant shadow impact. The existing structure on the project site reaches approximately 51 feet at the highest point, and the proposed buildings would be approximately 50 feet tall and contained within the existing structure. Because there are intervening structures along Brannan Street of similar or greater height, the proposed project would not have the potential to increase shadows in South Park or any other property protected under Section 295.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
9. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒	☐
c) Physically degrade existing recreational resources?	☐	☐	☐	☒	☐

Parks and Recreation. The addition of residents from the proposed project would likely increase the demand for park and recreation services and facilities. Parks and recreational facilities in the area include South Park (three blocks to the north), Barry Bonds Jr. Field (four blocks to the south), South Beach Park, and other open space along The Embarcadero. The proposed project would increase demand for and use of recreation facilities and services, but not in excess of the amounts provided for in the project area. The proposed project would provide 5,400 gsf of common open space for its residents, which is in excess of *Planning Code* requirements.[21] The proposed project would also include a public plaza area on the retail frontage along Townsend Street and an improved public sidewalk along Clarence Place. Hence, the demand generated for parks and recreational facilities by the proposed project would not result in a significant impact on existing services and facilities.

In 1998, the City of San Francisco initiated the Great Parks for a Great City Assessment Project to determine the conditions of the park system, as well as to determine future needs. In August of 2004, the San Francisco Recreation and Park Department published a Recreation Assessment Report (Report) that evaluates the recreational needs of San Francisco residents.[22] Nine service area maps were

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[20] Letter from Mat Snyder, San Francisco Planning Department, dated October 18, 2006, Case No. 2005.0470K, available for review by appointment at the San Francisco Planning Department, 1660 Mission Street, Suite 500, San Francisco, California.

[21] Section 135 of the *Planning Code* requires that approximately 48 sf of common usable open space per unit be provided in the SL 1 zoning district, or 4,080 sf for the proposed 85 units.

[22] San Francisco Recreation and Park Department, Recreation Assessment Report, August 2004. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E, and is available online at http://www.parks.sfgov.org/site/recpark_index.asp?id=27310.

developed for the report. The service area maps were intended to help Recreation and Park Department staff and key leadership assess where services are offered, how equitable the service delivery is across the City, and how effective the service is as it applies to participating levels overlaid against the demographics of where the service is provided. A review and interpretation of the data on the service area maps revealed that Census Tract 179.01, in which the project site is located, is not considered a high need area for recreation and open space improvements, based on the proximity of South Park and the demographics of the area.

Community Facilities. The addition of residents from the proposed project would increase the demand for libraries, community centers, and recreational facilities. The San Francisco Public Library opened a new branch in 2006 at Fourth Street and Berry Street, in the Mission Bay area, approximately 0.35 mile from the project site. Other nearby branches include the Main Branch at 100 Larkin Street (approximately two miles northwest of the site) and the Potrero Branch at 1616 20th Street (approximately two miles south of the site). The Potrero Branch is scheduled for renovation, to be completed by 2008. With the addition of the new library branch, existing and new facilities would be sufficient to meet local demand generated by the proposed project.

A variety of community centers/facilities are also available in the vicinity of the project site. The Community Service Directory on the San Francisco Public Library website lists 315 community organizations in the SoMa neighborhood.[23] These organizations include: arts facilities and performance spaces, public gardens, youth and family centers, health services, employment offices, legal services, language and cultural centers, housing offices, programs for the elderly, crime prevention groups, museums, and other community organizations. Demand for various community services generated by the proposed project would be distributed to various community organizations. Due to these factors, library services and community centers would not be significantly affected by the proposed project.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
10. UTILITIES AND SERVICE SYSTEMS—Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒	☐

[23] San Francisco Public Library (2006). *San Francisco Community Services Directory*. Accessed at: http://sflib1.sfpl.org:83/search/X?SEARCH=94103+or+94107+or+s%3Asouth&SORT=R&x=47&y=9

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒	☐
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒	☐

The project site is well served by existing utilities and public services including wastewater collection and transfer, stormwater drainage, solid waste collection and disposal, police and fire services, and power, water, and communication facilities. The proposed project would increase demand for and use of public services and utilities on the site and would add to cumulative water and energy consumption but not in excess of amounts projected by agencies responsible for management of those services and utilities.

Wastewater/Storm water. Project-related wastewater and storm water would flow to the City's combined storm water and sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into the Bay. Because the NPDES standards are set and regulated by the Bay Area Regional Water Quality Control Board (RWQCB), the proposed project would not conflict with RWQCB requirements. The proposed project would not require substantial expansion of wastewater/storm water treatment facilities or an extension of a sewer trunk line as the site is currently served by existing facilities. As no new wastewater/storm water infrastructure would be required to serve the proposed project, no impact would result from new construction.

Water. All proposed large-size projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand under Senate Bill 610 and Senate Bill 221.[24] In May 2002, the San Francisco Public Utilities Commission (SFPUC) adopted a

[24] California Department of Water Resources (2003). Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001. Accessed at: www.owue.water.ca.gov/Guidebook_101003.pdf

resolution finding that the SFPUC's Urban Water Management Plan (UWMP) adequately fulfills the requirements of the water assessment for water quality and wastewater treatment and capacity as long as a proposed project is covered by the demand projections identified in the UWMP,[25] which includes all known or expected development projects and projected development in San Francisco at that time through 2020. The UWMP utilizes ABAG projections in determining projected growth for the area, and as discussed above in Population and Housing on p. 25, the proposed project would be within the projected population growth for the City of San Francisco. Therefore, the proposed project would not exceed the UWMP's water supply projections. No additional construction of water supply infrastructure would be required to serve the proposed project or cumulative development.

Solid Waste. The Altamont Landfill has an annual solid waste capacity of 2,226,500 tons for the City of San Francisco. However, the City is well below its allowed capacity, generating approximately 550,000 tons of solid waste in 2005.[26] Recycling, composting, and waste reduction efforts are expected to increasingly divert waste from the landfill. The City Board of Supervisors adopted a plan in 2002 to recycle 75 percent of annual wastes generated by 2010. The proposed project's residents and commercial occupants would be expected to participate in the City's recycling and composting programs and other efforts to reduce the solid waste disposal stream. The Altamont Landfill is expected to remain operational for 20 or more years, and has current plans to increase capacity by adding 250 additional acres of fill area. With the City's increase in recycling efforts and the Altamont Landfill expansion, the City's solid waste disposal demand could be met through at least 2026. Given the existing and anticipated increase in solid waste recycling and the proposed landfill expansion in size and capacity, the impacts on solid waste facilities from the proposed project would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
11. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☐	☒	☐

[25] City and County of San Francisco, Public Utilities Commission, Resolution No. 02-0084, May 14, 2002.
[26] Drda, Brad, Environmental Services Manager, Sanitary Fill Company, Personal communication with EIP Associates, March 14, 2006.

Police Protection Services. Development of the proposed project would bring new residential and retail uses to the project area. This increased intensity of uses could potentially increase the service calls to the San Francisco Police Department (SFPD) and could require increased crime prevention activities and additional policing of the project area. The project site is in the Southern Metro jurisdiction of the SFPD. The closest police station is the Southern Station at 850 Bryant Street, approximately one mile from the project site. The Mayor's *Proposed 2006-2007 Budget* includes an eight percent funding increase for policing services, including the hiring of up to 98 additional police officers and support staff.[27] Given staffing and funding increases, the SFPD has sufficient resources to accommodate a project of this size. With the planned increases in city-wide personnel, the Southern Station would be able to provide the necessary police services and crime prevention programs for the project area. No new stations are proposed in the project vicinity. Hence, the proposed project would have no impact on the need for new policing facilities.

Fire Protection Services. The proposed project would increase the demand for fire protection services within the project area. The project area is served by Stations 1, 8, and 35, by Battalion Chief B3, and by Rescue 1 of the San Francisco Fire Department (SFFD). One of the most important criteria for effective firefighting is the response time needed to reach the site of an emergency. The SFFD has stated that the existing fire protection response times in the South of Market area are between 2.5 and 4.5 minutes, and that these response times are acceptable according to SFFD standards.[28] The SFFD reports sufficient staffing and equipment levels to meet demand for fire protection services under current conditions and for projected demand expected with population increases in the project area.[29] Traffic delays and added call volume may result due to cumulative development in the project area; however, the SFFD is able to minimize potential impacts by shifting primary response duties to other nearby stations. The proposed project would be required to comply with all regulations of the 2001 California Fire Code, which establishes requirements pertaining to fire protection systems, including the provision of state-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems. Hence, the proposed project would not result in the need for new fire protection facilities, resulting in impacts to the physical environment.

Schools. The San Francisco Unified School District (SFUSD) provides school services to the project area. Currently, the SFUSD has fifteen elementary schools, three middle schools, and two high schools located within two miles of the proposed project site. The target capacity for the SFUSD

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[27] Newsom, Gavin, City and County of San Francisco. *Mayor's Proposed Budget 2006-2007.*

[28] Chin, Paul H., San Francisco Fire Department. *Memo Regarding Fire and Emergency Services,* March 15. 2006.

[29] Chin, Paul H. 2006

schools in the area is 7,902 students (or up to 8,238 with bungalow classrooms). Total current enrollment for schools within this area is 6,863 students. Therefore, the student enrollment for these schools is under capacity by 1,039 students (14 percent less than the target capacity).[30] District-wide enrollment is projected to fall by nine to 13 percent by 2011. However approximately 1,000 new students are likely to be added to the Bayview/Hunters Point, Hunters Point, and Mission Bay neighborhoods due to an increase in new housing in these areas. It is likely that many of these students will attend currently under-utilized schools in the SoMa neighborhood. Overall, the proposed project is not expected to contribute to the need for new school facilities that would result in physical impacts.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
12. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

The project site is currently occupied by the California Electric Light Company Station B building and is being used for commercial parking. The building occupies the entire lot and does not support or provide habitat for any rare or endangered wildlife or plant species. There are no trees on the lot and no special-status bird species are known to nest in the area. There are no riparian or wetland areas on the project site. The project vicinity is an urban environment and experiences high levels of human

[30] San Francisco Unified School Districts, *2002 Capacity Analysis*, School Facilities Master Plan, Accessed online at: http://portal.sfusd.edu/template/default.cfm?page=ops.master_plan

activities, and only common bird species are likely to nest in the area. The proposed project would not substantially affect any rare or endangered animal or plant species or the habitat of such species, nor substantially diminish habitat for fish, wildlife or plants, or substantially interfere with the movement of migratory fish or wildlife species. No landmark or significant trees would be removed as part of the project. Therefore, the proposed project would have no impact on biological resources.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

The Community Safety Element of the *San Francisco General Plan* contains maps that show areas subject to geologic hazards. The project site is located in an area subject to groundshaking from earthquakes along the San Andreas and Northern Hayward Faults and other faults in the San Francisco Bay Area (Maps 2 and 3 in the Community Safety Element), but no major faults are located within 1 mile of the subject property. The project site is also within an area of liquefaction potential (Map 4 in the Community Safety Element), a Seismic Hazards Study Zone designated by the California Division of Mines and Geology. In San Francisco, unengineered artificial fill was used during the mid-19th century to reclaim property from the Bay. Natural drainages and tidal flats were also reclaimed with artificial fill, including those in the China Basin area. Based on subsurface investigations, the soil

beneath the site consists of heterogeneous fill over shallow bedrock. Bedrock was encountered at depths ranging from directly below the concrete slab flooring to about 6 feet below the slab.

It is anticipated that the project would require excavation to a depth of approximately 8 feet (to account for the proposed below-grade parking). The project would not significantly alter the topography of the site, or otherwise affect any unique geologic or physical features of the site because the site is relatively flat and has been developed for about 118 years. Because the project sponsor is required to implement construction Best Management Practices listed on the Stormwater Pollution Prevention Program "Checklist for Construction Requirements," implementation of erosion and sedimentation control measures, as required by the City and/or resource agencies, would minimize short-term construction-related impacts to a less-than-significant level. A geotechnical report was prepared for a previously-proposed project at the site by Treadwell & Rollo, Inc., in August 2002. The report identified surface and subsurface conditions, and made recommendations for construction features and project design to reduce hazards on the site.[31] Report recommendations include using tiedown anchors to prevent seismic uplift, installing a moisture prevention barrier under any concrete slab flooring, and recommendations for types of fill material and compaction. To ensure compliance with all San Francisco Building Code provisions regarding structural safety, the San Francisco Department of Building Inspection (DBI) would review the geotechnical report and building plans for the proposed project, and would determine necessary engineering and design features for the project to reduce potential damage to structures from groundshaking and liquefaction. Therefore, potential damage to structures from geologic hazards on the project site would be minimized through the recommendations contained in the geotechnical report and review of the building permit application pursuant to its implementation of the Building Code.

In addition, any changes incorporated into the foundation design required to meet the San Francisco Building Code Standards that are identified as a result of the DBI building permit application review process would constitute minor modifications of the project. These minor modifications would not require additional environmental analysis.

[31] Treadwell & Rollo, Geotechnical Investigation, 178 Townsend Street, San Francisco, CA, August 14, 2002. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
14. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	☐	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒	☐
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

The project would renovate the California Electric Light Company Station B building and construct a residential and retail development within the structure. The existing building occupies the project site and as such the project site is currently impervious. The proposed project would remove the existing roof to accommodate the proposed residential and retail uses within the exterior building structure. The proposed project would include impervious surfaces throughout and therefore would not affect the area of impervious surface at the site. Also, as the proposed project would retain the exterior structure of the building, the project would not result in substantial erosion or alter site drainage. During construction, requirements to reduce erosion would be implemented pursuant to San Francisco Building Code Chapter 33, Site Work, Demolition and Construction and the California Building Code

Chapter 33, Excavation and Grading. These erosion reduction measures would ensure protection of water quality.

The primary existing use at the project site is vehicle parking. As discussed, the project would not substantially affect the area of impervious surface at the site or alter site drainage. Currently, groundwater is not used at the site and no groundwater was encountered in the test borings conducted for the geotechnical testing. Any groundwater encountered during construction of the proposed project would be subject to the requirements of the City's Industrial Waste Ordinance (Ordinance Number 19977), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. Therefore, groundwater resources would not be substantially degraded or depleted, and the project would not substantially interfere with groundwater recharge.

Any exposure of soil during site preparation would occur below street grade, and since the project site is relatively level, there would be low potential for flooding, erosion, or siltation resulting from the project. Therefore, the proposed project would not substantially degrade the public water supply or groundwater quality, or cause substantial flooding, erosion, or siltation.

In light of the above discussion, there would be no significant impacts on water resources resulting from the proposed project.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
15. HAZARDS AND HAZARDOUS MATERIALS Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☐	☒	☐

A Phase I Environmental Site Assessment (ESA) was prepared for the project site in March 2005, by ACC Environmental Consultants.[32] The Phase I ESA lists current and past operations, reviews environmental agency databases and records, identifies site reconnaissance observations, and summarizes potential contamination issues. A limited subsurface investigation was completed for the site after the discovery of a previously unknown underground storage tank. This Soil Characterization Report was prepared for the project site in March 2005 by ACC Environmental Consultants.[33] A Lead Based Paint Survey Report[34] and an Asbestos Survey Report[35] were also completed for the project site in March 2005 by ACC Environmental Consultants. The findings of the reports are summarized in this section.

Hazardous Materials Use. The proposed project would involve the development of up to 85 residential units with retail use, open space, and parking spaces, which would result in use of relatively small quantities of hazardous materials for routine purposes. The development would likely handle common types of hazardous materials, such as cleaners and disinfectants. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. For these reasons, hazardous materials used during project operation would not pose any substantial public health or safety hazards related to hazardous materials.

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32 ACC Environmental Consultants, *Phase I Environmental Site Assessment 166-178 Townsend Street, San Francisco, California*, March 17, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

33 ACC Environmental Consultants, *Soil Characterization Report 178 Townsend Street, San Francisco, California*, March 1, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

34 ACC Environmental Consultants, *Lead Based Paint Survey Report Parking Garage 178 Townsend Street, San Francisco, California*, March 8, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

35 ACC Environmental Consultants, *Asbestos Survey Report Parking Garage 178 Townsend Street, San Francisco, California*, March 8, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

Proximity to Hazardous Sites. A review of available environmental regulatory agency database listings was completed as a component of the Phase I ESA prepared for the project site. At the time of preparation of the Phase I ESA, the project site was listed on the Department of Toxic Substances Control (DTSC) Haznet database, which is a database that extracts from hazardous waste manifests received each year by the California Environmental Protection Agency and DTSC. The project site was listed on this database two times under West Wind Automotive, which generated oxygenated solvents and empty containers that were disposed at transfer centers and recyclers. According to the Phase I ESA, because this business disposed of the wastes under manifest, the wastes were disposed properly.

Underground Storage Tanks (USTs). The Phase I ESA identified a previously unknown underground storage tank adjacent to the building along Clarence Place. As a result, a limited subsurface investigation was completed to further characterize subsurface soil conditions and evaluate suspect environmental conditions. The primary goals of the subsurface investigation was to evaluate suspect petroleum hydrocarbons and solvents that may have penetrated the concrete slab, gasoline constituents adjacent to the unidentified UST, and total lead concentrations in shallow soil that may be excavated during redevelopment activities. Gasoline-impacted soil and bedrock were encountered in the immediate vicinity of the gasoline UST located on Clarence Place. Golden Gate Tank Removal, Inc. was contracted to remove the UST in accordance with state and local regulations in April 2005.[36] Regulatory case closure was issued by the City and County of San Francisco Department of Public Health, Local Oversight Program (DPH/LOP) for the site in July 2005, requiring no further investigation.[37]

For potential contamination assessment for surrounding or nearby sites, the Phase I ESA completed a search of standard regulatory agency databases and found 53 leaking underground storage tank (LUST) sites within one-half mile of the project site. Of these 53 sites, ten are located within 0.125 miles of the subject property. All ten of those sites have been granted closure status by the DPH/LOP. Due to the closed status of these sites, these off-site LUSTs would not affect the project site.

Soil and Groundwater. As discussed above, the Project Sponsor has provided a Soil Characterization Report prepared by ACC Environmental Consultants that is on file and available for public review at

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[36] Golden Gate Tank Removal, Inc., Tank Closure Report, 178 Townsend Street, San Francisco, CA 94107. June 3, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

[37] City and County of San Francisco Department of Public Health, Remedial Action Completion Certification LOP Case Number 11687, July 11, 2005.

the Planning Department as part of the project file.[38] The report found that there was varying levels of diesel-range and motor oil-range petroleum hydrocarbons but no significant lead concentrations. Motor oil-range petroleum hydrocarbons were relatively low according to the report and would not pose a worker safety or soil disposal issue. Halogenated volatile organic compounds (HVOCs) were not reported in two analyzed soil samples and are not suspected in the subsurface due to the thickness of the concrete slab(s).[39] Total lead in shallow soil averages approximately 31 mg/kg, well below the San Francisco Department of Public Health residential action level of 400 mg/kg. Lead is not considered a constituent of concern because the total lead was below the residential action level, the age of the building pre-dates the 1906 earthquake, and no fill materials or other earthquake debris were noted in shallow soil at the project site. In addition, the existence of competent bedrock, massive concrete, and one to three concrete slabs has effectively capped the project site and prevented or severely limited any contamination from migrating vertically into the subsurface.

As the Soil Characterization and Phase I ESA reports did not identify potential soil and groundwater effects resulting from past and existing uses, impacts from contamination would be considered less than significant.

Asbestos. As discussed above, an Asbestos Survey Report was completed for the project site by ACC Environmental Consultants in March 2005.[40] Asbestos-containing materials may be found within the existing structures that would be demolished as part of the project. Potential asbestos-containing materials include vinyl floor tile and grout in the office, lobby, and mezzanine areas; brick mortar throughout the exterior and interior walls and floors; and a fire door. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD, vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement is to be notified ten days in advance of any proposed demolition or abatement work in accordance with state regulations.

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[38] ACC Environmental Consultants, *Soil Characterization Report 178 Townsend Street, San Francisco, California*, March 1, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

[39] Subsurface investigations found that the entire site is underlain by one or more concrete slabs and/or concrete placed directly on competent bedrock.

[40] ACC Environmental Consultants, *Asbestos Survey Report Parking Garage 178 Townsend Street, San Francisco, California*, March 8, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

BAAQMD notification includes: listing the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age, and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations and will inspect any removal operation upon which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement activities. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the DBI would not issue the demolition permit until the Project Sponsor has complied with the notice requirements described above.

These regulations and procedures, already established as a part of the permit review process, would ensure that there would be no significant impacts from asbestos on the project site.

Lead-Based Paint. As discussed above, a Lead Based Paint Survey Report was completed for the project site by ACC Environmental Consultants in March 2005.[41] Since the California Electric Light Company Station B building was built in 1888, lead-based paint may be found in the existing building structures. Demolitions and alterations must comply with Chapter 36 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint. Where there is any work that may disturb or remove lead-based paint on the exterior of any building built prior to December 31, 1978, Chapter 36 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 36 applies to buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces), where more than a total of

[41] ACC Environmental Consultants, *Lead Based Paint Survey Report Parking Garage 178 Townsend Street, San Francisco, California,* March 8, 2005. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

10 square feet of lead-based paint would be disturbed or removed. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the US Department of Housing and Urban Development Guidelines (the most recent guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint-inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the Director of the DBI: of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; the anticipated start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is residential or nonresidential, owner-occupied, or rental property and the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance. Compliance with these San Francisco Building Code regulations and procedures would ensure that there would be no significant impacts from demolition of portions of the existing building containing lead-based paint.

Fire Safety and Emergency Access. San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes. The proposed project would conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for the proposed development. Potential fire hazards (including those associated with hydrant water pressure and blocking of emergency access points) would be addressed during the permit review process. Conformance with these standards would ensure

appropriate life safety protections for the residential structures. Consequently, the project would not create a substantial fire hazard nor interfere with emergency access plans.

Based on the above, there would be no significant impacts resulting from the proposed project related to hazards.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
16. MINERAL AND ENERGY RESOURCES—Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local *General Plan*, specific plan or other land use plan?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and II). This designation indicates that there is not adequate information available for assignment to any other MRZ and thus the site in not a designated area of significant mineral deposits. However, since the project site is already developed, future evaluation or designation of the site would not affect or be affected by the proposed project. There are no operation mineral resource recovery sites in the project vicinity whose operations or accessibility would be affected by the construction or operation of the proposed project.

Mineral Resources. No known mineral deposits exist on the project site. Thus, the proposed project would not result in the loss of availability of a locally or regionally important mineral resource.

Energy. The proposed project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulation enforced by the DBI. Other than natural gas and coal fuel used to generate the electricity for the project, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource.

San Francisco's 2002 Electricity Resource Plan discusses sources for electricity and projected citywide demand.[42] The PG&E peak load forecast is approximately 1200 megawatts, while the available capacity is over 1700 megawatts. The City plans to reduce consumption by 107 megawatts by 2012 through various energy efficiency strategies. Any new developments, including the proposed project, would be expected to conform to new City policies designed to reduce energy consumption. While the proposed project would increase new demand for electricity services, the project-generated demand for electricity would be negligible in the context of the overall consumer demand in San Francisco and the state. Therefore, the proposed project would not, in and of itself, generate a significant demand for energy and a major expansion of power facilities. For this reason, the project would not cause a wasteful use of energy and would not have a significant effect on natural resources.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
17. AGRICULTURE RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. **Would the project:**					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	☐	☐	☐	☐	☒

The project site is located within an urbanized area of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as "Urban and Built-up Land" (Department of Conservation 2002). Because the site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, unique farmland, or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land use or Williamson Act contract, nor would is involve any changes to the environment that could result in the conversion of farmland.

[42] San Francisco Public Utilities Commission and San Francisco Department of the Environment (2002). The Energy Resource Plan. Accessed at: http://sfwater.org/detail.cfm/MC_ID/7/MSC_ID/64/MTO_ID/NULL/C_ID/1346

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
18. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐	☐
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐	☐
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐	☐

As discussed in the above text, the proposed project could have potentially significant impacts on cumulative land use, transportation/circulation, and historic resources. These issues will be discussed in the EIR. The analysis also potentially significant impacts to archeological resources and air quality, which would be mitigated through implementation of Mitigation Measures 1 and 2, described in Section F, below.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measure would be necessary to reduce the potential impacts of the project and have been agreed to by the Project Sponsor.

Mitigation Measure 1: Archaeological Resources

Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The Project Sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall implement the ARD/TP. The consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for

review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archaeological Testing and Evaluation Plan. Analysis of subsurface conditions factors related to the structural integrity of the extant building determined that archaeological test trenches shall not be employed. Rather, archaeological monitoring, and data recovery if warranted, will suffice to mitigate impacts to potentially significant archaeological features should they exist within the project area.

An Archaeological Research Design and Treatment Plan (ARD/TP) has been prepared by the Project Sponsor in consultation with the ERO, subject to review and approval of the ERO.[43] The conclusions/recommendations described in the ARD/TP are as follows:

1) A qualified archaeologist monitor any and all demolition-related excavation in archaeologically sensitive areas, and be authorized to collect samples of and document any cultural resources encountered during demolition-related excavation

2) Archaeological monitoring and concomitant data recovery (should resources of potential significance be identified) be implemented to the fullest extent possible during project construction in order to identify and mitigate adverse impacts to archaeological resources.

Archaeological Monitoring Program. Due to the extensive layers of concrete and rubble encountered within the project area during the geotechnical studies documented by Treadwell and Rollo (2002), an archaeological monitoring program shall be implemented, rather than the test trenching that would normally be conducted. The archaeological monitoring program shall minimally include the following provisions included in the Archaeological Monitoring Plan designed for the project site:

- The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological

[43] Archeo-Tec, *Archaeological Research Design/Treatment Plan:178 Townsend Street Project.* Prepared for EIP Associates, June 2006. This report is available for review by appointment at the Planning Department, 1660 Mission Street, 5th Floor in Case File No. 2005.0470E.

monitoring because of the risk these activities pose to potential logical resources and to their depositional context;

- The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;
- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program. The archaeological data recovery program shall be conducted in accordance with the archaeological data recovery plan (ADRP) developed in the ARD/TP. The archaeological consultant, Project Sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation. The ADRP identifies how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP identifies what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The ARD/TP contains both a general Archaeological Data Recovery Plan and specific data recovery approaches for prehistoric and historic period cultural deposits; however, should a previously unanticipated cultural resource be identified during the course of archaeological research within the project site that is not treated in the ARD/TP, a brief, focused Archaeological Data Recovery Plan shall be prepared in consultation with the ERO to treat any such resource(s).

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, Project Sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archaeological Resources Report. The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California logical Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure 2: Construction Air Quality

The Project Sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the Project Sponsor shall require the contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose. The Project Sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and to implement specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

G. DETERMINATION

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION. including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

DATE 1/23/07

Paul E. Maltzer
Environmental Review Officer
for
Dean L. Macris
Director of Planning

APPENDIX B: 178 TOWNSEND STREET TRIP GENERATION

178 Townsend Street Trip Generation						
SUMMARY OF TRIPS AND PARKING DEMAND						
revised 1-10-07 version 2						
	Daily			PM Peak Hour		
Mode	Residential	Retail	Total	Residential	Retail	Total
Auto	209	66	275	49	11	60
Transit	107	31	138	25	5	30
Walk	203	64	267	47	12	59
Other	16	22	38	4	4	8
Total	**535**	**183**	**718**	**125**	**32**	**157**
Vehicle Trips	191	28	219	44	5	49
						32 inbound
Parking Demand	Residential	Retail	Total			17 outbound
Long Term	107	2	109			
Short Term	0	5	5			
Total	***107***	***7***	***114***			
Proposed Project						
Residential	51	studio/one bedroom units				
	34	two-plus bedroom units				
Retail	2,357	gross square feet				
Source: LCW Consulting, 2007						

PLACE
POSTAGE
HERE

The Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Attn: Bill Wycko
178 Townsend Street Project Draft Focused Environmental Impact Report
(Case No. 2005.0470E)

PLEASE CUT ALONG DOTTED LINE

RETURN REQUEST REQUIRED FOR FINAL
ENVIRONMENTAL IMPACT REPORT

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

TO: San Francisco Planning Department

Please check one:

☐ Please send me a hardcopy of the Final EIR.

☐ Please send me a CD of the Final EIR.

Signed: _____

Print Your Name and Address Below